

Report of the Interim Director of Planning, Regeneration & Public Realm

Address	HYATT PLACE 27 UXBRIDGE ROAD HAYES
Development:	Partial demolition of the existing building, followed by refurbishment, side extensions and upwards extensions, alongside erection of perimeter blocks around a podium level, to increase hotel capacity (Class C1) whilst introducing industrial uses (Class E(g)(ii) and E(g)(iii)) at ground and first floor level.
LBH Ref Nos:	2385/APP/2022/2952
Drawing Nos:	INF - HAP - ZZZ - L00 - DR - A - 0000 INF - HAP - ZZZ - B01 - DR - A - 0200 INF - HAP - ZZZ - L00 - DR - A - 0200 INF - HAP - ZZZ - L01 - DR - A - 0200 INF - HAP - ZZZ - L02 - DR - A - 0200 INF - HAP - ZZZ - L03 - DR - A - 0200 INF - HAP - ZZZ - L04 - DR - A - 0200 INF - HAP - ZZZ - L05 - DR - A - 0200 INF - HAP - ZZZ - L06 - DR - A - 0200 INF - HAP - ZZZ - L07 - DR - A - 0200 Demolition and Construction Method Statement (September 2022) 0303-BDL-XX-XX-DR-L-0805-P02 Delivery and Servicing Plan (including Waste Strategy) (September 2022) Transport Assessment (including Car Park Management Plan & Healthy Streets Assessment) (September 2022) Land Contamination Desk Study and Preliminary Risk Assessment Report Basement Impact Assessment Report (September 2022) Television and Radio Signal Survey & Reception Impact Assessment Planning Statement (September 2022) Statement of Community Involvement (August 2022) Commercial Strategy Report (August 2022) Daylight and Sunlight Report (August 2022) Flood Risk Assessment and Surface Water Management Strategy Water Cycle Strategy Hotel Needs Assessment Study (May 2022) Tree Survey Tree Survey, Arboricultural Impact Assessment Preliminary Arboricultural Method Statement & Tree Protection Plan Whole Life-Cycle Carbon Assessment (August 2022) Noise Assessment (September 2022) Wind Microclimate Assessment (August 2022) Energy and Sustainability Statement (September 2022) Circular Economy Statement (August 2022) Air Quality Assessment Hotel Sequential Assessment (August 2022) Townscape and Visual Impact Assessment (September 2022) Preliminary Ecological Appraisal Utilities Statement Planning Fire Statement (14-09-22) Community Investment Programme (September 2022)

Design and Access Statement (September 2022)
Highways Comment Response Note (November 2022)
Highways Comment Response Note (December 2022)
Hotel Management Strategy
Travel Plan (Rev. A) (December 2022)
0303-BDL-XX-XX-DR-L-0101-P04
0303-BDL-XX-XX-DR-L-0801-P08
0303-BDL-XX-XX-DR-L-0802-P03
0303-BDL-XX-XX-DR-L-0803-P03
0303-BDL-XX-XX-DR-L-0804-P03
Outline Construction Logistics Plan (September 2022)
INF - HAP - ZZZ - L09 - DR - A - 0201
INF - HAP - ZZZ - L10 - DR - A - 0201
INF - HAP - ZZZ - L11 - DR - A - 0201
INF - HAP - ZZZ - L12 - DR - A - 0201
INF - HAP - ZZZ - L13 - DR - A - 0201
INF - HAP - ZZZ - B01 - DR - A - 1000
INF - HAP - ZZZ - L00 - DR - A - 1000
INF - HAP - ZZZ - L01 - DR - A - 1000
INF - HAP - ZZZ - L08 - DR - A - 0201
INF - HAP - ZZZ - L02 - DR - A - 1000
INF - HAP - ZZZ - L03 - DR - A - 1000
INF - HAP - ZZZ - L04 - DR - A - 1000
INF - HAP - ZZZ - L05 - DR - A - 1000
INF - HAP - ZZZ - L06 - DR - A - 1000
INF - HAP - ZZZ - L07 - DR - A - 1000
INF - HAP - ZZZ - L08 - DR - A - 1001
INF - HAP - ZZZ - L09 - DR - A - 1001
INF - HAP - ZZZ - L10 - DR - A - 1001
INF - HAP - ZZZ - L11 - DR - A - 1001
INF - HAP - ZZZ - L12 - DR - A - 1001
INF - HAP - ZZZ - L13 - DR - A - 1001
INF - HAP - ZZZ - L14 - DR - A - 1001
INF - HAP - ZZZ - ZZ - DR - A - 0000
INF - HAP - ZZZ - ZZ - DR - A - 0300
INF - HAP - ZZZ - ZZ - DR - A - 0300
INF - HAP - ZZZ - ZZ - DR - A - 0400
INF - HAP - ZZZ - ZZ - DR - A - 1100
INF - HAP - ZZZ - ZZ - DR - A - 1100
INF - HAP - ZZZ - ZZ - DR - A - 1100
INF - HAP - ZZZ - ZZ - DR - A - 1100
INF - HAP - ZZZ - ZZ - DR - A - 1100
INF - HAP - ZZZ - ZZ - DR - A - 1200

Date Plans Received: 26/09/2022

Date(s) of Amendment(s):

Date Application Valid: 26/09/2022

1. SUMMARY

The proposed development seeks to increase the operational capacity of the existing hotel

use through the erection of two 'C' shaped perimeter-style buildings around the edge of the site, alongside an upward extension of the existing building by two storeys, which would be retained in the centre. The proposal also seeks to introduce 1,318 sqm of industrial floor space as part of a mixed-use development.

Although C1 hotel uses are not identified as appropriate for Strategic Industrial Locations (SILs), the proposal is considered acceptable in principle because the existing hotel use operates on the site. Furthermore, extant permission exists at 15-17 Uxbridge Road immediately to the east for a C1 apart-hotel. The proposed development also makes more efficient use of the site by increasing visitor capacity and introducing industrial floorspace appropriate to its location within the SIL. These are considered positive benefits of the proposal.

In terms of scale and massing, whilst the proposal's scale would be somewhat out of scale with the surrounding buildings, the increase in height compared to the existing building would be relatively minor. The proposal would have a similar overall impact on the skyline compared to the current situation.

The reduction in site-wide parking is supported by TfL and the council's Highways Officer on the basis that sustainable travel initiatives are secured by obligation, including contributions to improve the public realm in the immediate area. The proposal would not significantly impact the amenity of any nearby residential properties.

On balance, the proposal is acceptable, making efficient use of a brownfield site, and is recommended for approval, subject to the conditions and obligations in this report.

2. RECOMMENDATION

That delegated powers be given to the Director of Planning, Regeneration and Public Realm to grant planning permission, subject to the following:

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

- (i) Details shall be submitted for a Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;**
- (ii) A full Travel Plan, including a Low Emission Strategy, is to be submitted and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured;**
- (iii) To secure compliance with the submitted Hotel Management Strategy, to manage the ongoing operation of the hotel and demonstrate that the proposal operates within the C1 use class;**
- (iv) Hospitality Training, to provide apprenticeships and on-the-job training for young people interested in pursuing a career in the hospitality industry;**
- (v) Enter into a s278 agreement for works to the Highway, including the dropping and raising of kerbs (as required) and other such works as may be required to the highway to implement the development;**
- (vi) Secure compliance with the Community Investment Fund;**
- (vii) £268,698 as a financial contribution to be used by the Council to fund measures to reduce poor air quality within the borough;**

- (viii) £160,000 as a financial contribution to be used towards Active Travel Zone improvements to the local area, specifically to address walking and cycling deficiencies on the northern side of Uxbridge Road;
- (ix) A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge Condition 4, with the offset calculation based on £95 per tonne of CO2 over a 30 year period;
- (x) £10,000 as a financial contribution to be used towards consulting and implementing an extension to the nearby parking management scheme to include the surrounding area and Springfield Road; and
- (xi) A Project Monitoring and Management Fee, equalling 5% of the total financial contributions paid under this agreement.

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

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

D) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Director of Planning, Regeneration and Public Realm), delegated authority be given to the Director of Planning, Regeneration and Public Realm to refuse planning permission for the following reason:

'The applicant has failed to secure the necessary legal obligations associated with the proposed development and provide contributions towards the improvement of services and facilities as a consequence of demands created by the proposed development (in respect of Construction and Employment Training, Travel Planning, Hotel Management, Hospitality Training, Highways Works, Air Quality, Active Travel, Carbon Offsetting, Traffic Impacts, and Project Monitoring). The scheme therefore conflicts with Policy DF1 of the London Plan (2021), Policy DMCI 7 of the Hillingdon Local Plan Part 2 (2020) and the Planning Obligations Supplementary Planning Document (2014).'

E) That if the application is approved, the following conditions be imposed:

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 approved shall not be carried out except in complete accordance with the details shown on the submitted plans and shall be retained as such, numbers:

- INF - HAP - ZZZ - L00 - DR - A - 00001
- INF - HAP - ZZZ - B01 - DR - A - 10001
- INF - HAP - ZZZ - L00 - DR - A - 10002

INF - HAP - ZZZ - L01 - DR - A - 10003
INF - HAP - ZZZ - L02 - DR - A - 10004
INF - HAP - ZZZ - L03 - DR - A - 10005
INF - HAP - ZZZ - L04 - DR - A - 10006
INF - HAP - ZZZ - L05 - DR - A - 10007
INF - HAP - ZZZ - L06 - DR - A - 10008
INF - HAP - ZZZ - L07 - DR - A - 10009
INF - HAP - ZZZ - L08 - DR - A - 10010
INF - HAP - ZZZ - L09 - DR - A - 10011
INF - HAP - ZZZ - L10 - DR - A - 10012
INF - HAP - ZZZ - L11 - DR - A - 10013
INF - HAP - ZZZ - L12 - DR - A - 10014
INF - HAP - ZZZ - L13 - DR - A - 10015
INF - HAP - ZZZ - L14 - DR - A - 10016
INF - HAP - ZZZ - ZZ - DR - A - 11001
INF - HAP - ZZZ - ZZ - DR - A - 11002
INF - HAP - ZZZ - ZZ - DR - A - 11003
INF - HAP - ZZZ - ZZ - DR - A - 11004
INF - HAP - ZZZ - ZZ - DR - A - 11005
INF - HAP - ZZZ - ZZ - DR - A - 12001

And the submitted documents, titled:

Transport Assessment (including Car Park Management Plan & Healthy Streets Assessment) (September 2022),
Land Contamination Desk Study and Preliminary Risk Assessment Report,
Basement Impact Assessment Report (September 2022),
Television and Radio Signal Survey & Reception Impact Assessment,
Planning Statement (September 2022),
Statement of Community Involvement (August 2022),
Commercial Strategy Report (August 2022),
Daylight and Sunlight Report (August 2022),
Flood Risk Assessment and Surface Water Management Strategy,
Water Cycle Strategy,
Hotel Needs Assessment Study (May 2022),
Tree Survey,
Tree Survey, Arboricultural Impact Assessment Preliminary Arboricultural Method Statement & Tree Protection Plan,
Whole Life-Cycle Carbon Assessment (August 2022),
Noise Assessment (September 2022),
Wind Microclimate Assessment (August 2022),
Circular Economy Statement (August 2022),
Air Quality Assessment,
Hotel Sequential Assessment (August 2022),
Townscape and Visual Impact Assessment (September 2022),
Preliminary Ecological Appraisal,
Utilities Statement,
Planning Fire Statement (14-09-22),
Community Investment Programme (September 2022),
Design and Access Statement (September 2022),
Highways Comment Response Note (December 2022),
Hotel Management Strategy,

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

3 OM19 Construction Management Plan

Prior to the commencement of the development hereby approved (including demolition), a Demolition and Construction Logistics Plan (DLP/CLP) and a Demolition and Construction Management Plan (DMP/CMP) shall be submitted to, and approved in writing by, the Local Planning Authority (in consultation with RAF Northolt), to minimise impacts to the local highway network, and to control noise, vibration and air pollutants generated as a result of the construction process. These documents shall be prepared in accordance with the London Freight Plan, 'The control of dust and emissions from construction and demolition' Supplementary Planning Guidance, BRE Pollution Control Guides 'Controlling particles and noise pollution from construction sites' and 'Controlling particles, vapour and noise pollution from construction sites'.

The DLP/CLP and DMP/CMP shall include details of (but shall not necessarily be limited to):

- (i) a programme of works, including hours of construction;
- (ii) the measures for traffic management and encouragement of sustainable modes of transport for workers, including prohibition of construction vehicles parking on the local highway network within the vicinity of the application site;
- (iii) the haulage routes and details of a vehicle booking system including use of a banksman (if applicable), ensuring construction deliveries are received outside peak hours;
- (iv) any closures of public routes and diversions, demonstrating how time spent closed to the public has been minimised;
- (v) the provision of secured restricted access as the sole means of entry to site for cyclists along with a secured turnstile entrance for pedestrians;
- (vi) a site plan identifying the location of the site entrance, exit, visibility zones, wheel washing, hard standing, hoarding (distinguishing between solid hoarding and other barriers such as heras and monarflex sheeting), stock piles, dust suppression, location of water supplies and location of nearest neighbouring receptors;
- (vii) the loading, unloading and storage of equipment, plant, fuel, oil, materials and chemicals;
- (viii) details of cranes and other tall construction equipment (including the details of obstacle lighting);
- (ix) the means to prevent deposition of mud on the highway and chemical and/or fuel run-off from into nearby watercourse(s);
- (x) a dust risk assessment, including means to monitor and control dust, noise and vibrations, following the published guidance by The Institute of Air Quality Management (IAQM) on how to assess impacts of emissions of dust from demolition and construction sites.
- (xi) the likely noise levels to be generated from plant and construction works and the precautions set out to eliminate or reduce noise levels where the operational risk levels illustrated within The Control of Noise at Work Regulations 2005 could be exceeded;
- (xii) confirmation that a mobile crusher will/won't be used on site and if so, a copy of the permit and intended dates of operation;
- (xiii) confirmation of all Non-Road Mobile Machinery (NRMM) to be used, or a statement confirming that NRMM will not be used. All Non-Road Mobile Machinery (NRMM) and plant to be used on site of net power between 37kW and 560 kW shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance

"Control of Dust and Emissions During Construction and Demolition" and must be registered at <http://nrmm.london/>;

(xiv) an asbestos survey and management plan; and

(xv) the arrangement for monitoring and responding to complaints relating to demolition and construction.

and, for the avoidance of doubt:

(i) all Heavy Goods Vehicles associated with the development shall comply with the Direct Vision Standard, with a rating of 3 stars (or more).

(ii) all deliveries to the site, particularly Heavy Goods Vehicles, shall be made using vehicles which have a Class VI mirror fitted in accordance with EU directive 2007/38/EC;

The development hereby approved shall be implemented in accordance with the approved DLP/CLP and DMP/CMP.

REASON

To ensure that the proposed development does not interfere with the free flow of traffic and conditions of safety on the public highway, to ensure the development process does not have a significant adverse impact on the amenities of nearby residential properties, in accordance with Policies DMT 1, DMT 2, and DMEI 14 of the Hillingdon Local Plan: Development Management Policies (2020) and Policies D14, SI 1, T4, and T7 of the London Plan (2021). Also, to ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (2020).

4 SUS1 Energy Strategy

Prior to commencement of the development hereby approved (excluding demolition), a Detailed Energy Assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (April 2020 or as amended). The assessment shall clearly identify the baseline energy demand and associated carbon emissions in accordance with the prevailing building regulation requirements. The assessment shall then clearly define the 'be lean', 'be clean' and 'be green' measures to demonstrate that the development will meet as far as practicable the zero carbon standards of the London Plan and the minimum standards for onsite energy efficiency. Where the measures do not collectively contribute to a zero carbon saving (noting a minimum requirement of 35% saving onsite) to the agreement of the Local Planning Authority, the report shall set out:-

(a) the 'onsite saving' and

(b) the 'shortfall'; to be presented in tCO2/annum.

The 'shortfall' shall then be subject to an offsite contribution in accordance with the London Plan Policy SI2.

In addition, the energy assessment shall also demonstrate a reduction in emissions across the existing building that is to be retained. The assessment shall set out the current energy baseline ('existing building baseline') for the building to be retained, the impact of the refurbishment (including the new facade) and measures that will be incorporated to reduce the emissions as much as reasonably practicable from the

'existing building baseline' position.

The Energy Assessment shall also provide details of the 'be seen' recording and reporting measures to be agreed in writing by the Local Planning Authority. The 'be seen' measures must comply with the requirements of London Plan Policy SI2 and demonstrate that the 'onsite saving' is being achieved in perpetuity.

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

REASON

In order to deliver the maximum on-site carbon savings in accordance with Policies SI 2 and SI 3 of the London Plan (2021).

5 A35 Bird Hazard Management Plan

Prior to the commencement of the development hereby approved (excluding demolition), a Bird Hazard Management Plan (BHMP) shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with RAF Northolt. The BHMP shall include details of the management of flat roofs and include measures to avoid access to the underside of the solar arrays and framework by hazardous birds, to prevent the creation of an attractive environment for hazardous birds, such as feral pigeons and large gulls.

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

REASON

To minimise the potential of the works approved to provide a habitat desirable to hazardous large and/or flocking birds which could pose a considerable hazard to aviation safety, exacerbated by the proximity of RAF Northolt, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (2020).

6 A20 Wheelchair Accessible Requirements

Prior to the commencement of the development hereby approved (excluding demolition), details shall be submitted which show that either:

(a) 10% of the new bedrooms shall be wheelchair accessible (in accordance with Figure 52, incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice); or

(b) 15% of the new bedrooms shall be accessible rooms (in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice).

REASON

To ensure that people with disabilities have adequate access to the development in accordance with Policies D5 and E10 of the London Plan (2021).

7 COM15 Sustainable Water Management

Prior to the commencement of the development hereby approved (excluding demolition), an Updated Sustainable Urban Drainage Strategy shall be submitted to, and approved in writing by, the Local Planning Authority.

The Drainage Strategy shall, as a minimum, include further details of:

- Maintenance, including the maintenance owner

- Proof of consent from Thames Water to allow a connection to the Thames Water sewer
- Peak Flow Control (the proposed runoff rate for the 1 in 1 year event should be lower than the greenfield rate for the 1 in 1 year event)

REASON

To ensure compliance with Policy SI 12 of the London Plan (2021).

8 COM30 Contaminated Land

(i) Prior to the commencement of the development hereby approved (excluding demolition), a scheme to deal with unacceptable concentrations of contamination, including any identified asbestos materials, within the soil shall be submitted to and approved in writing by the Local Planning Authority (LPA). The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A site investigation, including soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified person/s. 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 will be verified, 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 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 and/or engineering 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 factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

All works which form part of any required 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.

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 Policies DMEI 11 and DMEI 12 of the Hillingdon Local Plan: Development Management Policies (2020).

9 H14 Cycle Storage

Prior to any above ground works for the development hereby approved (excluding demolition), further details of the cycle storage shall be submitted to, and approved in writing by the Local Planning Authority. The details shall show a minimum of 32 long-stay spaces, 8 short-stay spaces and 3 cargo cycle spaces for the industrial units and 22 long-stay and 10 short-stay cycle spaces for the hotel.

The details shall further demonstrate how the cycle spaces accord with the London Cycling Design Standards (LCDS), and in particular, shall show that at least 20% of spaces are provided as Sheffield stands at a standard spacing (1.2m preferred, 1.0m minimum), and that at least 5% of cycle parking spaces are suitable to accommodate larger and adapted cycles (with a minimum of 1.8m spacing between stands).

Thereafter, the development shall not be occupied or brought into use until the approved cycling facilities have been implemented in accordance with the approved details, with the facilities being permanently retained for use by cyclists.

REASON

To encourage an uptake in cycling in accordance with Policy T5 of the London Plan (2021).

10 COM26 Ecology and UGF

Prior to any above ground works for the development hereby approved (excluding demolition), a Biodiversity Enhancement and Management Plan (BEMP) shall be submitted to, and approved in writing by, the local planning authority. The BEMP shall demonstrate how the development hereby approved shall seek to maximise the delivery of on-site biodiversity improvements, including through the delivery of new trees, flower-rich perennial planting, mature shrubs, green roofs and walls, and bird or bat boxes.

In addition, the proposal shall achieve an Urban Greening Factor (UGF) of at least 0.39, as shown on Drawing No. 0303-BDL-XX-XX-DR-L-0805-P02.

The development shall thereafter be implemented in accordance with the approved BEMP.

REASON

In order to encourage a wide diversity of wildlife on site in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Development Management Policies (2020) and Policies G5 and G6 of the London Plan (2021).

11 DIS2 Fire Strategy

A) Prior to any above ground works for the development hereby approved (excluding demolition), the principles of a Fire Statement shall be submitted to, and approved in writing by, the Local Planning Authority. The statement shall detail how the development will function in terms of:

- (i) the building's construction: methods, products and materials used, including manufacturers' details
- (ii) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- (iii) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans

- (iv) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- (v) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- (vi) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

B) Prior to occupation of the development hereby approved, the final comprehensive Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. This should be accompanied by the Building Control Decision Notice or equivalent. Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

12 H8 Parking Design and Management Plan

Prior to any above ground works for the development hereby approved (excluding demolition), a Parking Design and Management Plan shall be submitted to, and approved in writing by the Local Planning Authority. It shall include the following:

- (i) The arrangements for all on-site parking, including a booking system, and to include provisions for managing, monitoring, enforcement and review. All on-site parking spaces shall be solely for use by the development hereby approved (e.g. staff, visitors, guests) and shall not be used for any other purpose or leased/sub-let.
- (ii) Details of 18 parking bays and 14 wheelchair accessible parking pays; to be permanently retained within the car parking area.
- (iii) Details of 20% active electric vehicle charging points (and 80% passive) for the hotel spaces.
- (iv) Details of active electric vehicle charging points for all operational spaces.
- (v) Details of pedestrian / cyclist priority routes and wayfinding across the site.

The vehicle parking provision and its management, as outlined in the approved Parking Design and Management Plan, shall be fully implemented as approved prior to the first occupation of the development, and so maintained in good working order, and the parking spaces shall not be used for any other purpose for the lifetime of the development.

REASON

To ensure the appropriate operation of the car parking spaces in accordance with Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Development Management Policies (2020) and Policies T5 and T6 of the London Plan (2021).

13 COM9 Landscaping

Prior to any above ground works for the development hereby approved (excluding demolition), a scheme of landscaping shall be 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 Means of enclosure/boundary treatments
 - 2.c Hard Surfacing Materials
 - 2.d External Lighting
 - 2.e Other structures (such as play equipment and furniture)

3. Living Walls and Roofs
 - 3.a Details of the inclusion of living walls and roofs; or
 - 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 surfacing/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 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies G5 and SI 7 of the London Plan (2021).

14 COM7 Materials

Prior to any above ground works for the development hereby approved (excluding demolition), details of all materials and external surfaces, including fenestration, balconies, boundary treatments and balustrades, shall be submitted to, and approved in writing by, the Local Planning Authority.

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

Thereafter the development shall be constructed in accordance with the approved details and be retained as such.

REASON

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

15 DIS1 Minibus Shuttle Service Management Plan

Prior to the first use of the development hereby approved, a Minibus Shuttle Service Management Plan (MSSMP) shall be submitted to, and approved in writing by, the local

planning authority. The MSSMP shall, as a minimum, set out the number and type of minibuses to serve the site, hours of operation, destinations served, parking arrangements, pick-up/drop off facilities, booking arrangements, payment, and details of accessibility for disabled people.

REASON

In accordance with Policy T7 of the London Plan (2021).

16 COM25 Delivery and Servicing Plan

Prior to the first use of the development hereby approved, a Delivery and Servicing Plan, including tracked vehicle movements where necessary, shall be submitted to, and approved in writing by, the Local Planning Authority to demonstrate how the industrial units and the hotel will operate, both independently and together. Deliveries should be received outside of peak hours and in the evening or night time.

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

REASON

To encourage out of hours/off peak servicing to help mitigate the site's contribution to local congestion levels in compliance with Policy T7 of the London Plan (2021) and Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020).

17 COM12 Restriction of Industrial Floorspace

The 'industrial' floorspace hereby approved at ground and mezzanine level, as shown on Drawing Nos. INF - HAP - ZZZ - L00 - DR - A - 10002 and INF - HAP - ZZZ - L01 - DR - A - 10003, shall be used as light industrial or research and development floorspace only, falling within the E(g)(ii) or E(g)(iii) use classes, as set out in the Town and Country Planning (Use Classes) Order (1987) (as amended).

REASON

To ensure the development brings forward an increase in industrial capacity and to prevent inappropriate uses within a SIL, in accordance with Policies E4, E5 and E7 of the London Plan (2021).

18 A12 Coaches

The development hereby approved shall not be served by coaches, and shall not allow coaches to enter the site.

REASON

To ensure the proposal does not impede the free flow of traffic or worsen pedestrian safety in accordance with Policy T7 of the London Plan (2021), as there does not appear to be sufficient room within the site for coaches to safely enter, turn around, and leave in forward gear.

19 COM31 Secured by Design

The development 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 part of the development hereby approved shall be occupied until accreditation has been achieved.

REASON

To ensure the development provides a safe and secure environment in accordance with

Policy DMHB 15 of the Hillingdon Local Plan: Development Management Policies (2020) and Policy D11 of the London Plan (2021).

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.

DMAV 1	Safe Operation of Airports
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 1	Employment Uses in Designated Sites
DME 4	Visitor Attractions
DME 5	Hotels and Visitor Accommodation
DME 6	Accessible Hotels and Visitor Accommodation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP E10	(2021) Visitor infrastructure
LPP E2	(2021) Providing suitable business space

LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E5	(2021) Strategic Industrial Locations (SIL)
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G5	(2021) Urban greening
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP SD1	(2021) Opportunity Areas
LPP SD6	(2021) Town centres and high streets
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SD8	(2021) Town centre network
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.2	(2021) Office parking
LPP T6.4	(2021) Hotel and leisure use parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

3 I14A Compliance with Legislation Administered by EPU

Your attention is drawn to the attached note 'Environmental Control on Construction Sites'

4 I3 Building Regulations - Demolition and Building Works

Your attention is drawn to the need to comply with the relevant provisions of the Building Regulations, the Building Acts and other related legislation. These cover such works as - the demolition of existing buildings, the erection of a new building or structure, the extension or alteration to a building, change of use of buildings, installation of services, underpinning works, and fire safety/means of escape works. Notice of intention to demolish existing buildings must be given to the Council's Building Control Service at least 6 weeks before work starts. A completed application form together with detailed plans must be submitted for approval before any building work is commenced. For further information and advice, contact - Residents Services, Building Control, 3N/01 Civic Centre, Uxbridge (Telephone 01895 558170).

5 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.

6 I70 LBH worked applicant in a positive & proactive (Granting)

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

7 I73 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2019. 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 cil@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

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

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

8

The London Fire Brigade advise that the applicant should ensure that the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector who in some circumstances may be obliged to consult the Fire Authority.

Regard should also be had to Guidance note 29 on Fire Brigade Access similar to that in B5 of the Building Regulations. Particular attention should be made to paragraph 16, Water Mains and Hydrants, by the applicant.

If there are any deviations from the guidance in ADB) vol 1 and 2: B5 Access and facilities for the fire service in relation to water provisions, then this information needs to be provided to the Water Office (water@london-fire.gov.uk) to discuss the proposed provision.

If there are any deviations to Brigade access and facilities, then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision.

Once we have received this information then the LFB can provide a response on the consultation. Advice in regard to hydrants can be provided upon receipt of an appropriate site plan showing premises layout, access to it, and water supply infrastructure if

available.

9

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C01%7CPlanningEConsult%40Hillingdon.Gov.UK%7C57c0ec7383d49de023d08dab7f71351%7Caaacb679c38148fbb320f9d581ee948f%7C0%7C0%7C638024569051600737%7CUnknown%7CTWfPbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoi%2luMzliLCJBTil6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=A7W1Tv6lhyLapHEP8vbvW2tjF9g6dnPhKcM7aCfwho%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

3. CONSIDERATIONS

3.1 Site and Locality

The application site comprises a square-shaped plot of approximately 0.6 hectares, containing a 12-storey building in use as a hotel, falling within the C1 use class, and the surrounding land which is primarily used for surface-level external parking to serve the hotel.

The surrounding area has a very mixed character, with predominantly residential uses on the opposite side of Uxbridge Road to the north and industrial uses to the south, whilst Uxbridge Road includes a wide mix of retail, restaurant, takeaways and other town centre uses along its length, usually as part of small parades, such as can be found at the junction of Brookside Road and Uxbridge Road to the north of the application site.

The site falls within the Springfield Road Strategic Industrial Location (SIL) (part of the wider Hayes Industrial Area), which extends from the Paddington Arm of the Grand Union Canal in the east to the Green Belt adjacent to the A312 in the west, and from Uxbridge Road in the north to Beaconsfield Road in the south. The site also falls within the Heathrow Opportunity Area, which, whilst not well-defined, is considered to extend northwards from Heathrow to Uxbridge Road in this part of the borough.

3.2 Proposed Scheme

The proposed development seeks to significantly expand the scale of the existing hotel use through the erection of two 'C' shaped perimeter-style buildings around the edge of the site, alongside an upward extension of the existing building by two storeys, which would be retained in the centre. The two perimeter buildings would be 8-storeys facing Uxbridge Road, with the western building stepping down in scale to 7 and then 6 storeys facing Springfield Road to the west, whilst the south-eastern block of the eastern perimeter building would be 6-storeys, but otherwise this eastern building would maintain its eight-storey height along its east flank. The perimeter buildings would be connected to the central building and each other through raised walkways at each level, whilst a courtyard

podium would be provided at second floor level to the west of the retained central building.

As a result of these additions, the hotel capacity would increase from 170 to 435 rooms, an increase of 265, whilst the proposal also includes the provision of 1,318 sqm of light industrial floorspace, falling within the E(g)(iii) use class, to be provided at ground floor and mezzanine level beneath the podium courtyard, comprising 15 units.

Parking across the site would decrease from 70 to 39 spaces, with 32 safeguarded for use by the hotel, 6 safeguarded for use by the industrial units, and 1 dedicated 'Zipvan' bay, and with the sole point of vehicular access and egress located in the south-west corner facing Springfield Road.

3.3 Relevant Planning History

2385/APP/2005/3477 Hayes Gate House 27 Uxbridge Road Hayes

CHANGE OF USE OF HAYES GATE HOUSE FROM OFFICE TO HOTEL AND CONFERENCE FACILITIES, ALTERATIONS TO HAYES GATE HOUSE BUILDING, ERECTION OF A FREESTANDING THREE STOREY MEDIA CENTRE, ANCILLARY CAR PARKING AND LANDSCAPING.

Decision: 12-06-2008 Approved

2385/APP/2011/1143 Hayes Gate House, 27 Uxbridge Road Hayes

Application for a new planning permission to replace an extant planning permission in order to extend the time limit for implementation ref: 2385/APP/2005/3477 dated 16/6/2008- Change of use of Hayes gate house from office to hotel and conference facilities, alterations to Hayes Gate House building, erection of a freestanding three storey media centre, ancillary car parking and landscaping.

Decision: 14-06-2012 Approved

2385/APP/2013/2523 Hayes Gate House, 27 Uxbridge Road Hayes

Change of Use of existing office (B1) building to create 170 bedroom hotel (C1) use with ancillary car parking and landscaping.

Decision: 20-11-2013 Approved

2385/APP/2022/714 Hyatt Place 27 Uxbridge Road Hayes

Use of site as a Class C1 Boarding House (Application for a Certificate of Lawful Development for a Proposed Use or Development)

Decision: 28-04-2022 Approved

Comment on Relevant Planning History

As the planning history indicates, the building was initially built and used as an office, however was granted approval to be used as a hotel in June 2008, and subsequently re-approved in June 2012 and February 2014. This existing C1 use was confirmed as lawful in April 2022 through the submission of a certificate of lawfulness.

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 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)
The London Plan (2021)
The West London Waste Plan (2015)

The National Planning Policy Framework (NPPF) (2021), Planning Practice Guidance, as well as relevant supplementary planning documents and guidance are all material consideration in planning decisions.

The proposed development has been assessed against development plan policies and relevant material considerations.

UDP / LDF 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.E1 (2012) Managing the Supply of Employment Land
PT1.E3 (2012) Strategy for Heathrow Opportunity Area
PT1.E6 (2012) Small and Medium-Sized Enterprises (SME)
PT1.EM11 (2012) Sustainable Waste Management
PT1.EM8 (2012) Land, Water, Air and Noise

Part 2 Policies:

DMAV 1 Safe Operation of Airports
DMCI 7 Planning Obligations and Community Infrastructure Levy
DME 1 Employment Uses in Designated Sites
DME 4 Visitor Attractions
DME 5 Hotels and Visitor Accommodation
DME 6 Accessible Hotels and Visitor Accommodation
DMEI 10 Water Management, Efficiency and Quality
DMEI 12 Development of Land Affected by Contamination
DMEI 14 Air Quality
DMEI 2 Reducing Carbon Emissions
DMEI 7 Biodiversity Protection and Enhancement

DMEI 9	Management of Flood Risk
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D2	(2021) Infrastructure requirements for sustainable densities
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP E10	(2021) Visitor infrastructure
LPP E2	(2021) Providing suitable business space
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E5	(2021) Strategic Industrial Locations (SIL)
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP G5	(2021) Urban greening
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP SD1	(2021) Opportunity Areas
LPP SD6	(2021) Town centres and high streets
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SD8	(2021) Town centre network
LPP SI1	(2021) Improving air quality
LPP SI2	(2021) Flood risk management
LPP SI3	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI7	(2021) Reducing waste and supporting the circular economy
LPP T1	(2021) Strategic approach to transport

LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.2	(2021) Office parking
LPP T6.4	(2021) Hotel and leisure use parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction

5. Advertisement and Site Notice

5.1 Advertisement Expiry Date:- **24th November 2022**

5.2 Site Notice Expiry Date:- Not applicable

6. Consultations

External Consultees

FIRE BRIGADE (10-11-22): The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises. The Applicant is advised to ensure the plans conform to Part B of Approved Document of the Building Regulations and that the application is submitted to Building Control/Approved Inspector who in some circumstances may be obliged to consult the Fire Authority. LFB have no further observations to make.

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (15-10-22): Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The application site is not in an Archaeological Priority Area and there are few records in the vicinity which indicate low archaeological potential.

No further assessment or conditions are therefore necessary.

GREATER LONDON AUTHORITY (STAGE 1 SUMMARY) (05-12-22): The proposals result in the re-introduction of SIL conforming uses at the site through the inclusion of 1,318 sq.m. of light industrial floorspace alongside an extension to the existing hotel creating an additional 265 bedrooms. The proposed intensification of a sensitive (hotel) use within a SIL would not comply with Policy E7.

However, it is accepted that the lawful use of the site is for a hotel which alongside the introduction of SIL conforming uses, would not compromise the integrity of the remainder of the SIL in line with Policy E7 and D13 and so would be acceptable (paragraphs 15-24).

Further consideration of visual, functional, environmental, and cumulative impacts is required before compliance with Policy D9 (Part C) can be verified (paragraphs 25-44).

Contributions towards Healthy Streets improvements, implementation of a CPZ, and improving the active travel environment should be secured in line with Policy T4. A Parking Management Plan, EVCPs, Travel Plan, Delivery and Servicing Plan and Construction Logistics Plan should all be

appropriately secured (paragraphs 45-53).

Additional information and justification is required regarding the energy strategy, whole life carbon and circular economy, urban greening, flood risk and drainage, air quality before compliance with the London Plan can be confirmed (paragraphs 54-65).

HEATHROW AIRPORT SAFEGUARDING (18-10-22): We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

NATIONAL AIR TRAFFIC SERVICE (07-10-22): 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.

MOD - RAF NORTHOLT SAFEGUARDING (26-10-22): The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The applicant is seeking full approval for the demolition of ground floor entrance, parking structure and north-east and south-west wings of the existing building, and refurbishment and extension of existing hotel to include additional accommodation at roof level and full height extension on the north elevation, together with walkways connecting to new buildings of between 6 and 8 storeys, to create additional hotel floor space (Use Class C1) and light industrial floorspace (Use Class E(g)), along with ancillary facilities, parking and landscaping.

RAF Northolt is an operational airfield that provides a home to several units including 32 Squadron who operate both fixed wing and rotary aircraft. The development proposed has the potential to attract and support bird species deemed hazardous to aircraft safety.

The application site occupies the statutory safeguarding zone surrounding RAF Northolt. In particular, the aerodrome height and birdstrike safeguarding zones surrounding RAF Northolt and is approximately 4.4km from the centre of the airfield.

The Aerodrome Height Safeguarding Zone defines zones around aerodromes to regulate the height of structures to prevent the obstruction of the critical air space encompassing the aerodrome in which the principal take-off, landing and circuiting procedures are contained.

Having reviewed the proposals, I can confirm the MOD has no concerns with regards to the height of the proposed development.

Within the Birdstrike Safeguarding Zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or flocking birds close to the aerodrome.

The proposals include flat and green/biodiverse roofs with solar arrays installed. Green/biodiverse roofs have the potential to be attractive to nesting large gulls as they mimic more natural cliff top nesting sites. The proposed solar arrays have the potential to allow feral pigeons to nest within the framework, as well as providing shelter within the lea of the panels for nesting large gulls therefore a robust Bird Hazard Management Plan (BHMP) will be required to prevent the use of the roof spaces by hazardous birds.

To address the potential of the development to provide a desirable habitat for hazardous birds, the

MOD require that a condition is attached to any permission which requires the submission of a Bird Hazard Management Plan.

The MOD recognises that cranes may be used during the construction of buildings at this site. Due to the close proximity of RAF Northolt, these may affect the performance of the air traffic safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

The MOD would request that a condition be included in any planning permission granted to ensure that the MOD is notified of when and where cranes will be erected.

In summary, subject to the above conditions being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application.

TRANSPORT FOR LONDON (09-12-22): In line with Policy T2, all developments are expected to deliver improvements that support the 10 Healthy Streets indicators. The Healthy Streets approach seeks to improve air quality, reduce congestion, and make attractive places to live, work and do business. There are ten Healthy Street indicators which put people and their health at the heart of decision making and aim to result in a more inclusive city where people choose to walk, cycle and use public transport.

An Active Travel Zone Assessment (ATZ) and Healthy Streets assessment has been carried out in line with London Plan Policy T2. Four routes to key destinations have been identified including public transport access points, shops and services, leisure, and local community facilities. The three key routes are as following:

- Southall Station
- Hayes and Harlington Station
- Hayes and Harlington Station via Minet Country Park

The routes/destinations have been agreed within Hillingdon Council. Given the transitory nature of the land uses (being hotel and small business incubator) in this case, the limited number of destinations is sufficient.

In line with TfL guidance, an Active Travel Zone (ATZ) assessment has been submitted. Noting the shift nature of the hotel use and the rural nature of one of the ATZ routes, a night-time assessment of the alternative routing should be completed to ensure suitability for staff who work in shift patterns. This assessment should inform further discussions with the relevant highway authority about appropriate mitigation.

As highlighted above, located along Uxbridge Road is a segregated cycle way. An assessment of the quality of this cycle route should be undertaken. The proposed development should seek to connect to, and where necessary improve, this cycling network to support a strategic modal shift, in line with Policy T1 and Policy T5. In addition, the two new pedestrian access points on the northern boundary should be designed to complement the existing segregated cycle lane and be mindful of potential conflict of movement.

Within the site, pedestrian priority and wayfinding should be set out clearly through the rear carpark/loading area to ensure guest, employee, and visitor safety. It must be ensured that the walking and cycling routes within the site boundary are suitable, safe and attractive at all times, particularly noting the shift nature of the proposed development. From the information submitted, it does not appear that the development is providing a clear and safe space for pedestrian movement within the loading area, and this should be addressed.

It is noted that new landscaping, planting, enlarged footways and seating will be implemented along Springfield and Uxbridge Roads. Improvements to the active travel environment/public realm should be secured in line with London Plan policy T4.

TfL welcomes commitment to cycle hire contribution which should be secured through the appropriate legal mechanism. It is expected that streetscape improvements will either fall within the scope of a Section 278 agreement or be secured through a Section 106 agreement.

In line with the Mayor's Vision Zero ambition, which aims to remove all deaths and serious injuries from London's transport network by 2041, the applicant has reviewed accident statistics in proximity to the site. On the three routes selected it was found that there were eleven clusters were identified where 2 or more serious collisions occurred near to each other. A fatal collision occurred between a goods vehicle and a cyclist along South Road. The assessment found that most appropriate means of reducing the potential for collisions to occur would be to segregate vehicular and non-motorised vehicle traffic or significantly decrease vehicular traffic generally. A contribution towards the further establishment of segregated cycle ways should be secured.

The access arrangements indicated on plan entails the retention of the existing Hotel vehicular access point on Springfield Road. This does not raise any specific concerns, although site manoeuvring will not be suitable for coaches. A condition should be applied to prevent coaches from servicing the site. If the proposed access arrangement changes TfL will need to be formally reconferred.

High-quality cycle parking forms a key part of achieving mode shift in accordance with London Plan policy T1 and the quantity and quality of cycle parking should reviewed and monitored as part of travel plan measures. As currently presented the cycle parking provided meets the quality of cycle parking anticipated by the London Cycle Design Standards (LCDS).

The cycle parking provision for all proposed land uses at this is site will be in line with the minimum standards identified in Policy T5. In addition, to the general cycle parking, three cargo bike spaces will be provided, which is welcomed. TfL supports that over eighty percent of the spaces will be "Sheffield" type, in excess of London Cycle Design Standards (LCDS) standards. It is strongly recommended that the proposed cycle parking should adhere to this guidance and managed via a Parking Management Plan. Details of cycle parking should also be secured by condition.

There are 70 existing car parking spaces on site. A total of 32 car parking spaces are proposed to be retained, which take the form of 18 standard parking spaces and 14 disabled person parking spaces. Given the site is within the Hayes Opportunity area, 19 car parking spaces is the maximum permitted car parking permitted under London Plan policy. Whilst the level of car parking is within maximum London Plan policy T6 levels, due to the package of measures put forward by the applicant, a further reduction/removal of car parking would be supported. Any spaces should also meet 20% active Electric Vehicle Charging Points and 80% passive provision required in accordance with LP Policy T6.2.

To reduce potential car parking overspill, the applicant has committed to a financial contribution towards a Controlled Parking Zone to encompass Springfield Road which should be secured via the appropriate legal mechanism.

If the proposal for car parking remains, this should be pre-booked and charged at an appropriate rate to discourage usage. The Travel Plan/Car Park Management Plan should monitor usage, include mechanisms to restrict usage, and include details on how to repurpose spaces which are not used.

There will be a covered area to enable the setting down and picking up of hotel guests by car. In addition, a minibus parking space will be provided. Six van parking spaces, 1 accessible car parking

spaces and 1 commercial vehicle 'car club' van space will be provided for the light industrial element. The applicant is encouraged to introduce active electric vehicle charging provision at all spaces in order to future-proof spaces.

Trip generation information has been provided and the approach is acceptable. There will be up to 54 additional vehicle movements proposed across peak times. Although the net impact on the strategic transport network can be accommodated; these numbers highlight the need for the aforementioned active travel improvements and TfL strongly recommends that the Council secures such works as part of any permission.

A multi-modal trip generation assessment including TRICS data has been provided as part of the application.

It will be necessary to enhance active travel provision and implement travel planning measures to achieve mode shift to public transport and active modes in accordance with the Mayor's strategic mode shift target identified within Policy T1.

The Travel Plan should include modal targets which are in line with the Mayor's strategic mode shift identified in Policy T1.

A Framework Travel Plan is provided which sets targets for a mode shift for hotel travel (guests and employees) away from car use. Additional measures/scope are needed to include the commercial element of this proposal. The targets contained within this plan should align with the Mayor's strategic mode shift target, with measures focus on increasing modes of sustainable and active travel. The Travel Plan should be secured via the appropriate legal mechanism in accordance with Policy T4.

The travel plan should be updated to list additional cycling measures including surveys to address any increased demand in cycle storage facilities required and to provide cycle repair facilities. The full Travel Plan should be secured, monitored, enforced, reviewed, and funded via planning obligation.

A Servicing and Delivery Plan has been submitted with this proposal and confirms that all activity is to take place on site, which is in line with Policy T7. It should be ensured that all delivery and servicing activity can be undertaken in line with the Mayor's Vision Zero and Healthy Streets approach. TfL will expect a full delivery and servicing plan (DSP) to be secured through condition, in line with Policy T7. The plan will need to detail how the delivery and servicing will be managed and should consider the use of cargo bikes (or other sustainable freight options) to minimise van/truck movements.

A full construction logistics plan (CLP) should be secured through condition, in line with Policy T7. TfL will need assurances that the construction of the proposed development will not impact on the safety and function of the adjoining highway network, in particular that of bus stops in proximity to the site and their associated operations. Safe and clear pedestrian and cycle routes should be secured to access the operating Hotel premises. The Construction Logistics Plan should be updated to include swept path analysis for construction vehicles to ensure any reverse manoeuvring is minimised. A final version of the CLP should be secured through condition in line with Policy T7 and contain detail on the measures that will be implemented to minimise the impact on the surrounding transport network and demonstrate how construction will be carried out in accordance with the Mayor's Vision Zero and Healthy Streets principles.

THAMES WATER (27-10-22): Waste Comments - As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or

equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line, Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

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

Supplementary Comments

Wastewater: As per pre-development enquiry, Proposed site: Existing hotel with 181 rooms to be reconstructed with total 427 rooms. Proposed foul water: To discharge by gravity to 300mm foul sewer in Springfield Road, manhole 3702. Proposed surface water (3100m² impermeable area): To discharge by gravity to 375mm surface sewer in Uxbridge Road, manhole 4704 (restricted to 2.4l/s for all storms up to and including 1:100+40%CC). Regarding proposed sump pump in basement, the applicant should design the basement to minimise the potential need for a sump to only in rare events, such as internal water pipe leaks and failures. The public sewer system is not designed to accept groundwater flows and permanent groundwater flows (outside of dewatering etc. necessary during construction) are not permitted. Where existing connections are proposed, we recommend a drainage survey to check for (illegal) misconnected drainage and that the existing private drainage is fit for purpose. Misconnections are where wastewater is discharged into surface water drainage or surface water is discharged into a foul sewer. In line with London Plan 9.5.11, "Development proposals should therefore take action to minimise the potential for misconnections." Misconnections can result in either surface water pollution or consumption of capacity in the foul sewer.

Internal Consultees

ACCESS OFFICER (18-10-22): This application for a new lifestyle hotel and workplace for local manufacturing has been the subject of extensive pre-application discussions which have included expressing the requirement to achieve the highest standards of accessibility and inclusive design.

This proposal is subject to compliance with London Plan policy D5, D12, E10 and T6. The application as submitted provides very little detail on how the principals of Accessibility and Inclusive Design have been incorporated into the final design. Although, it is acknowledged that the facility is fundamentally accessible the final points of access must be clarified and also secured by way of suitable planning conditions.

The proposal appears to include 23 accessible bedrooms with only 14 parking spaces provided. A parking space should be allocated to every accessible bedroom, or an alternative measure detailed in the Travel Plan.

AIR QUALITY OFFICER (11-04-23): The proposed development is located within the LBH Air Quality Management Area and Ossie Garvin Focus Area Focus Area, bringing additional traffic emissions which will add to current likely exceedances and contribute to poor local air quality. As per the London Plan, developments need to be neutral as minimum and LBH requires new developments located in Focus Areas to be air quality positive, contributing to the reduction of emissions in these sensitive areas.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019-2024), namely Focus Areas. Furthermore, policy DMEI 14 of the emerging London Borough of Hillingdon Local Plan (part 2), requires active contribution towards the continued improvement of air quality, especially within the Air Quality Management Area.

According to LBH Local Action Plan, proposed development within Focus Areas (or with impacts on FAs) needs to be Air Quality positive and further action is required to reduce total emissions produced by its operation.

Therefore, the total emissions associated with these activities need to be mitigated. Mitigation measures to reduce emissions can be applied on-site or off-site. Where this is not practical or desirable, pollutant off-setting will be applied. The level of mitigation required associated with the operation phase of the proposed development is calculated using Defra's Damage Cost Approach.

The mitigation measures proposed were evaluated in terms of likely emission reductions onto local air quality. Wherever quantifiable, these are calculated and subtracted from the overall value due. When no quantification is possible, a flat rate discount is applied. Table 1 and 2 summarise the aspects of air quality and planning requirements for the proposed development.

The total level of mitigation required to the proposed development for traffic emissions is £488,542. Once all deductions were applied, the remaining value of mitigation due is £268,698.

Flat rate deductions applied are as follow: Travel Plan (15%), Green Sustainable Measures (5%), contribution to long term LBH strategic long-term strategies (e.g. multimodal shift) (25%), totalling a reduction of £219,844.

Therefore, a section 106 agreement with the LAP of £268,698 is to be paid for Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

BIODIVERSITY OFFICER (31-01-23): I have no objections to the ecology assessment and general approach subject to a condition seeking an ecological enhancement plan (standard condition).

CONTAMINATED LAND OFFICER (07-11-22): I have reviewed a copy of the following report which was submitted in support of the abovementioned application. The desk study report provides the

required details including an initial Conceptual Site Model and Preliminary Risk Assessment. The report identifies various potential pollutant linkages may be present at the site. A site investigation is recommended, and the works should be implemented in accordance with details within the report.

I therefore recommend a condition to be imposed if planning consent is awarded.

ECONOMIC DEVELOPMENT (29-11-22): The application to transform the current 170 bed-room Hyatt hotel facility into a 435-bedroom hotel and 1885 sqm industrial incubator facility cannot from an Economic Development perspective be supported.

This view could be seen as an unusual stance from an economic development perspective as officers tend to be supportive of economic investment on the scale outlined in the application, but the stance reflects the concerns over the practicality of the scheme on this site and this location.

The current Hyatt hotel is a landmark hotel on the Uxbridge Road and serves a range of different client groups, including local commercial concerns, relatives and friends visiting nearby residents and travellers for Heathrow.

The proposal to increase the capacity by 265 rooms should not be an issue from an Economic development perspective, but the limited facilities and amenities the expanded hotel offers make it difficult to believe that this is a serious proposition.

The concerns over the credibility of the proposition are heightened when the lack of parking for a development of this scale in this location is factored in.

An expanded hotel of this scale looking to provide facilities for the commercial sector or serving Heathrow would be expected to have significant restaurant, bars and events hosting and meeting facilities. The proposal to include a small cooking facility with a small induction hob and microwave would seem an unusual for a hotel looking to serve the commercial sector.

The soon to be completed West London Film studio facility and the forthcoming Colt data centre facility will create significant additional commercial demand, however nothing in the application suggests that this proposal will provide facilities that will be attractive to the local commercial sector.

Whilst the applicant highlights the opportunity to the expanded hotel the new film studio facility will offer, it is difficult to envisage how the expanded hotel facility will be of use to the film studios with the limited vehicle facility that accompanies the expanded hotel facility.

With the level of equipment, those working in film and TV production support sector normally require and the early starts on site, film crews tend to need significant parking facilities. Even if the equipment required by those working in film production is left in the film studios, realistically they would need to have secure parking at the film studios or nearby.

Both the existing studios and new extension have limited parking facilities, therefore it is not an option for the studios to provide parking. The proposed reliance on public transport and cycle provision is unlikely to make the expanded hotel attractive to the film production sector as is suggested in the application.

Offering just 14 accessible and 18 general parking spaces, from an economic development perspective it is difficult to envisage a 435 bedroom hotel in this location appealing to the commercial / employment sector. For the expanded hotel facility to operate as the application suggests all the commercial parking would in effect need to be 'off site' or in nearby residential streets.

The proposal to have just one loading bay space for a hotel of this scale is also questionable and it is

entirely predictable that deliveries to the hotel will overlap and any overlapping in terms of deliveries will undoubtedly add to the operational challenges that the hotel will face given the already limited parking provision.

The application suggests that minibuses will be used to link the hotel with Heathrow and Hayes and Harlington station and there is a proposal to run a service every 10-12 minutes. Whilst this is an interesting proposal, how realistic and financially viable the proposition is, is questionable.

The Hyatt brand is internationally recognised and associated with a quality product. Opening in 2016 The Hyatt Plaza has only been operational for a relatively short time but has become a local landmark as well as an asset to local businesses.

The proposed hotel is looking to operate as an independent and not aligned to a national chain. Whilst this in itself might not be an issue, it is certainly unusual for a hotel of this size not to be part of a branded and recognisable chain. There are no other 'independent' or nonaligned hotels this size within Hillingdon.

A proposal to deliver small flexible employment facilities would normally be supported from an Economic development perspective. However, it is the practical operational issues that make it difficult to envisage this proposal in this location being a viable proposition.

The plans show a range of employment uses on the ground floor and the supporting information highlights the range of different enterprises that could conceivably use the facilities if the development was built. These range from jewellery and craft type activities to food manufacturing and the term industrial incubator and the scale of the units hints at larger scale activity. Whether the range a mix of uses would work is difficult to gauge.

As with the hotel the lack of parking and servicing space raises the question as to whether the proposed facility is viable. The plans show a range of flexible space and fifteen separate work spaces but the parking allocation is for just seven vans, which includes one accessible and one Zip van parking space.

It is questionable given the scale and size of the workspace on offer and the opportunities for manufacturing and food production as suggested in the application as examples of businesses that could be housed, whether the infrastructure to support fifteen workshops is adequate.

The very limited parking provision would not support visitors or casual purchasers of services from dropping by but could bring additional unwanted traffic into the area if people chose to visit the site.

The application goes to considerable lengths to demonstrate that there is a shortfall of small-scale flexible employment space in the area, particularly when compared to the larger logistics and employment sites in the vicinity of Springfield Road. Whilst the provision of small employment space in the borough is an issue - it does not make incorporating an industrial incubator unit into a hotel in this location as the solution.

It is further noted that the application suggests that 75% of the businesses that are anticipated to use the proposed facility will be local businesses. The application however fails to demonstrate where or what form the local demand is that will take up 75% of the space. It is also questionable that even if the majority of workspace was taken up by local businesses, whether nearly all users of the facility would travel to the site by public transport, which given the lack of parking facilities would be the only option.

ENERGY OFFICER (31-01-23): The energy assessment is at a strategic and theoretical stage but is broadly sufficient. However a concern is the lack of attention to the existing building which will

have a new facade and refurbishment at ground and roof level. The Council would expect the applicant to demonstrate a greater degree of improvements to the existing building, and this would be secured by way of condition and through a legal agreement.

FLOOD AND DRAINAGE OFFICER (24-10-22): This application has not sufficiently demonstrated the use of the London Plan's drainage hierarchy and is proposing the following key items:

- Type of development: Major - Refurbishment and extension of an existing hotel building. No change of use.
- Flood risk: Low
- Types of conveyance / attenuation features: Blue and green roof systems with flows conveyed to attenuation tanks. Permeable paving with geo-cellular storage below.
- Runoff rate restriction (l/s): 2.4.
- Runoff attenuation volume (m³): 547.78
- Maintenance plan: Maintenance tasks have been provided for green roofs, permeable paving and attenuation tanks.

We object to the application for the following reasons:

- The SuDS features are to discharge into a surface water sewer. Consent has not been given by TW at the time of submission. The applicant is required to provide proof of consent for connection to the existing TW surface water sewer.
- More information is required about peak flow control. The proposed runoff rate for the 1 in 1 year event needs to be agreed with the LLFA, as it is currently higher than the greenfield rate for the 1 in 1 year event.
- The drainage strategy includes the maintenance tasks and frequencies for each drainage component proposed, but does not provide adequate information on the proposed maintenance owner.

To address the above, please can the applicant submit information which:

- Demonstrates that TW have provided consent for the proposed connection to the existing TW surface water sewer.
- Shows that the proposed runoff rate for the 1 in 1 year event adheres to the greenfield runoff rate, or that approval has been provided for the proposed rate by the LLFA.
- Confirms specific details for the maintenance owner of the proposed SuDS features.

HIGHWAYS OFFICER (24-11-22): An application has been received seeking planning permission to partially demolish and then extend an existing hotel to provide a new larger hotel together with use class E commercial, business, and services space. The site is situated on the corner of the A4020 Uxbridge Road and Springfield Road. Springfield Road serves numerous commercial uses as well as providing access to Hayes and Yeading FC football ground, Minet Country Park, the Guru Nanak Sikh Academy and the Nanaksar Primary School. The Guru Nanak Sikh Academy has a school role of more than 1,500 pupils aged between 4 and 18 years. The Nanaksar Primary has a role of 60 pupils aged 4 to 11 years - Springfield Road is well-used route to a school. The Metropolitan Police have made the Council aware that "joy-riding" and "car meets" is a problem along Springfield Road, in response the Council has installed traffic calming measures to deter this activity.

Parking along Springfield is a mix of single yellow, double yellow lines and unrestricted parking. On-street parking is further limited by many vehicle crossovers providing access to the commercial uses.

The site currently comprises an existing hotel building, formally known as Hyatt Place, accommodating 170no. bedrooms served by 70no. on-site car parking spaces. The proposal seeks

to extend the hotel to create an additional 265no. bedrooms providing 435no. in total. In addition, the proposal will provide 929sq.m (NIA) of use class E commercial, business, and services workspace.

The proposal would provide 32no. hotel car parking spaces of which 14no. would be accessible/disabled spaces. The commercial use would offer 5no. van car parking spaces, 1no. accessible/disabled space and 1no. car club space.

The site has a PTAL ranking of 2 bordering 3 indicating that access to public transport is moderate compared to London as a whole, this suggests hotel guests and people working at the hotel/commercial use would to some degree be reliant on the private car for trip making to and from the site.

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The published London Plan 2021 Policy T6.4 Hotel and leisure uses requires that the parking standards hotels in locations of PTAL 2 are assessed on a "case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels".

The parking standard at the existing hotel is 0.4no. spaces per room, applying the same standard to the proposal would give 174no. parking spaces ($435 \times 0.4 = 174$).

The forecast number of car trips generated has been derived from the number of car parking spaces to be provided, 14no. accessible, 18no. standard giving 32no in total. The applicant then reports that if all car parking spaces were occupied then 7.4% of guests would have arrived by car ($100/435 \times 32 = 7.4\%$). The figure of 7.4% is then halved "to reflect that whilst people who travel to stay at the hotel by car would not use the car for all journeys, and as such a mode share of 3.7% is assumed".

In simple terms it is claimed that the number of car trips the development would generate and mode split is dependent upon the number of car parking space provided at the final destination. In practice the decision to make a trip by car is dependent upon a combination of many other factors primarily cost and journey time, as well as specific requirements such as the need to carry luggage. The Highway Authority is mindful that a hotel of this size in a location with just moderate access to public transport could be expected to generate a significant number of private car trips which with limited parking on-plot would result in parking being displaced on-street. Based on the existing standard of parking provision, 0.4 spaces per room, there could be parking demand for up to 174no. vehicles, the proposal would provide just 32no. spaces, a shortfall of 142no. based on the existing standard. The proposal would effectively be car-free.

The Highway Authority has no objection to a car-free development per se, but it must be supported by a convincing Travel Plan that presents a range of measures that makes public transport and active travel to the hotel as attractive and convenient as making the same trip by private car. The Travel Plan that has been submitted alongside the planning application has been assessed and found to be lacking in several respects. Throughout the Travel Plan there are general statements about the measures that will be adopted to facilitate travel to the development by means other than the private car. However, there is no detail regarding what or how measures would be delivered, what would be the expected outcome, how would this be monitored and what actions would be taken should the initiative fail to deliver. No evidence is provided to give the Highway Authority confidence that the Travel Plan will deliver public transport use and active travel to and from the site for the lifetime of the development.

There are many aspects in which the Travel Plan fails, the following are just a few examples. The Travel Plan states that the Travel Plan coordinator will make themselves known to all employees but

there is no mention of doing the same for guests. This is a significant omission as it is the guests that will be greater in number and most likely to drive given, it is anticipated that they will have travelled a greater distance and be unfamiliar with the local area and transport opportunities.

The Travel Plan states that where on-street parking by a guest is found to occur then this could be used to terminate the associated contract. In practice this is unlikely to occur - would a family arriving by car and found to be parking on-street really be turned away if they are staying just one night?

Parking for the businesses that occupy the light industrial uses would be allocated on a "first come-first served basis", this would incentivise people to drive hoping a space would be available upon arrival.

The applicant mentions that there would be a dedicated mini-bus to chauffeur guests and employees between the site and location destinations, however there is no mention of this mini-bus in the Travel Plan Action Plan.

There are highway objections to this proposal as there would be insufficient supply of car parking on-plot with no genuine measures offered to reduce the demand to travel by private car. The development would result in people driving around looking for somewhere to park and errant/injudicious parking that presents a risk to road safety, this would be contrary to the published London Plan 2021 Policy T4 Assessing and mitigating transport impact which requires that "development proposals should not increase road danger".

HIGHWAYS OFFICER (05-04-23): These additional highway comments are in response to the receipt of a revised framework Travel Plan December 2022 and the applicants Highway Comments Response Note December 2022. To recap, the proposal is for a 435no. bedroom hotel that would provide just 18no. standard and 14no. disabled car parking spaces, it would in effect be car-free. This raises concerns that in the absence of parking being available on-plot and limited genuine travel choice being offered, staff and guests would resort to driving and most likely park on-street possibly errant and injudiciously resulting in parking stress that would impinge upon the free flow of traffic leading and an increased road safety risk. As such the proposal would be contrary to the published London Plan 2021 Policy T4 which requires that development proposals 'do not increase road danger'.

The Highway Authority has previously objected to the proposal as it would provide insufficient car parking on-plot but moreover it offered no genuine alternative to trip making by the private car. In response to these comments a revised framework Travel Plan December 2022 has been provided, this has been reviewed and the Highway Authority are able to make the following comments.

The revised framework Travel Plan now contains a commitment to provide two dedicated minibuses to shuttle hotel guests and employees between the site and key public transport nodes. If the proposal is recommended for approval the Highway Authority would require a planning condition requiring the applicant to submit a Minibus Shuttle Service Management Plan for approval. This document should set out the number and type of minibuses, hours of operation, destinations served, parking, pick-up/drop off facilities, booking arrangements, payment, accessibility for disabled people and all that other information the applicant anticipates the Highway Authority would need to be satisfied the Service would provide a real alternative to trip making to and from the proposal site by private car.

The Travel Plan sub-objective 2 makes a commitment to making all 'guests and employees aware of the limited car parking available, the Highway Authority considers this is key to the successful operation of the proposal in transport terms. If the proposal is recommended for approval the Highway Authority would require a condition obliging the applicant to submit a full Travel Plan for

approval, this full Travel Plan should clearly set out how guests would be clearly informed that the proposal offers only very limited car parking.

The framework Travel Plan also make mention of Personalised Journey Planning service. The Highway Authority considers this an effective intervention and how this would be delivered should also be clearly set out in the full Travel Plan.

As surety that the full Travel Plan would be delivered, and targets achieved the Highway Authority would require that the application pays a £20,000 bond secured via a 1990 Town and Country Planning Act s.106 legal agreement. If Travel Plan is not implemented or targets not met, the Highway Authority would use this bond to delivery the Travel Plan itself, if the Travel Plan is successful then the Bond would be returned after an agreed period.

The Highway Authority is mindful that despite the above Travel Plan interventions that the proposal may still displace parking on-street resultant in parking stress. To address this issue should it arise, the Highway Authority require that the applicant pays a £10,000 bond to the Council via a 1990 Town and Country Planning Act s.106 legal agreement to fund the introduction of parking restrictions. If parking problems do not materialise then the bond would be returned after an agreed period. This is something the applicant commits to doing in the Highways Comment Response Note December 2022.

The Highway Authority ask for a planning condition requiring the applicant to provide active electric vehicle charge points at 20% of car parking spaces with all the remainder having passive provision.

The Highway Authority requires that a Construction Logistics Plan, Service and Delivery Plan are submitted for approval; these documents should be produced based on the guidance produced by TfL tailored to the development and local circumstances. These should be secured by way of suitable planning condition.

As mentioned above, the Highway Authority is mindful that this would effectively be a car-free development. Without attractive and genuine alternative to trip making by the private car it is reasonable to assume that staff and guests would consider they have no option but to resort to driving to the proposal and in the absence of car parking being provided on-plot this would result in drivers parking errant and injudiciously on the surrounding streets. This would be contrary to the published London Plan 2021 Policy T4.

To protect against this situation arising, the Highway Authority require a developer contribution of £160,000 to be used to deliver pedestrian and/or cyclist facilities at the junction of Springfield Road/Uxbridge Road, such improvements would help to facilitate better access to the wider active travel network and by providing real travel choice it would reduce reliance on the private car for trip making to and from the site.

Subject to the above conditions there are no highway objections to this proposal.

DAYLIGHT / SUNLIGHT CONSULTANTS (07-12-22): The following properties have been assessed for daylight:

- 60-122 Uxbridge Road
- 124-126 Uxbridge Road
- 128-130 Uxbridge Road
- 132-134 Uxbridge Road
- 136-138 Uxbridge Road
- 140-142 Uxbridge Road
- 144-146 Uxbridge Road

- 148-150 Uxbridge Road
- 152-154 Uxbridge Road
- 156 Uxbridge Road
- 15-17 Uxbridge Road (future development)

The VSC results show that all windows at 60-122 and 156 Uxbridge Road meet target values.

There are a number of windows that fall short of target values at (the block) 124-154 Uxbridge Road and (yet developed) 15-17 Uxbridge Road.

Dealing firstly with (the block) 124-154 Uxbridge Road. All windows at 152-154 and 148-150 Uxbridge Road meet the target values.

Of the windows (21) to the remaining properties (124-146) on Uxbridge Road, all windows fall short of the target value. Two of these windows (W1/61 & W1/62 at 144-146) are marginal, with a reduction of 20.32 & 20.84%.

The remaining 19 windows saw reductions of between 21% and 26%.

No skyline analysis has also been undertaken. All rooms to 156, 152-154, 132-134, 124-126 & 60-122 pass the NSL test. Two further properties have rooms that fall marginally short, these being R1/72 21% reduction (148-150) and R1/22 20.2% reduction (128-130).

All of the remaining 9 rooms (from 95 tested) fall short of the target values. The reductions range from 24-27% (3 rooms at 144-146) and 32-37% (3 rooms at 140-142 and 3 rooms at 136-138).

Moving to (yet developed) 15-17 Uxbridge Road.

This will be the Apart Hotel and it has been assumed this building will be developed and occupied, before the redevelopment of Hyatt Place. Daylight analysis has been undertaken here.

Of the 144 windows tested, 132 meet target values, with 12 windows falling short. All 12 windows are located on the west elevation which looks onto Hyatt Place. There are 2 windows per floor from 1st to 6th floors, with two windows serving 1 studio on each floor.

Average daylight factor analysis has been undertaken, and the rooms do not fare much better.

The BRE guidance recognises that if neighbouring building are built close to the boundary, it will be difficult to achieve compliance.

Sunlight analysis has been undertaken and all windows tested meet the target values.

There are no amenity areas that will be affected by the development in terms of overshadowing.

Within the proposed scheme, of the 14 amenity areas analysed, 8 of these will receive 2 hours or more of sun over 50% of the area on 21st March. All of these areas are located at rooftop level. There are two rooftop areas that fall short of the target values, one area marginally, receiving sunlight to 49.3% of the area. These two areas are surrounded by high walls that would restrict sunlight, especially when this low to the horizon in March.

The remaining 4 amenity areas are at ground and low level, these are surrounded by high elevations on all sides. These areas will receive no sunlight on 21st March, because of the building heights and position of the sun. Further analysis has been undertaken on 21st June, where these areas fare better, some areas to the north will receive over 2 hours of sun.

NOISE OFFICER (07-10-22): Sufficient information has been provided by the Applicant to make a recommendation with respect to noise including a noise assessment report. It is recommended that no objection is made on noise grounds without condition. This takes into consideration the use of the rooms as transient as opposed to permanent accommodation for guests.

PLANNING POLICY OFFICER (28-10-22): As with all applications, it is important to understand whether the planning description is consistent with the overall submission, including the drawings that may be approved as part of the final decision notice.

The proposal includes a combination of existing units (170) that form part of the existing hotel and a series of additional new units. Officers have reviewed the floorplans and calculated that the total proposed mixed of units:

Type of room	Number of rooms	%
Central Small	15	3%
Existing Large	20	5%
Existing Medium	150	34%
Small	23	5%
Medium	76	17%
Standard	128	29%
Accessible	23	5%
Total:	435	

When the existing units are removed, the mix of new units is:

Type of room	Number of rooms	%
Central Small (15-17m ²)	15	6%
Small (18-25m ²)	23	9%
Medium (27m ²)	76	29%
Standard (34m ²)	128	48%
Accessible (34m ²)	23	9%
Total:	265	

The proposal therefore includes a high proportion of larger units. Page 82 of the Design and Access Statement outlines what the typical room layouts for each of these types of room is. It is noted that the majority of the new rooms (57%) are for larger sized units (34m²), which are only 3m² below the minimum space size for a self-contained studio (C3). Page 82 also indicates the introduction of 'suites', which includes an additional room from the typical bedroom and bathroom. The parameters of the room therefore increase the possibility of them being occupied on a more permanent basis.

It is also noted that these new standard and accessible rooms both have their own access points from the unit out of the building via both stairs and adjoining lifts. The standard and accessible rooms on the western side of the building have direct access out of the building on to Springfield Road. The standard and accessible rooms on the eastern side of the building have direct access to the car park, which in turn has a route to the Uxbridge Road via a side gate or through the vehicle access point off Springfield Road. This compares to the smaller existing rooms that would utilise the lifts in the hotel lobby.

The layouts also indicate space for cooking equipment within the unit. This is confirmed in the Fire Statement, which outlines that the open plan bedrooms will incorporate an on-suite and a small cooking facility including a small induction hob and microwave. The Fire Statement indicates that the building is to be constructed in line with Regulation 7(2), despite the planning description not referring to the inclusion of any dwellings. This, in part, is due for a desire to have 'greater flexibility in the use of the building, future proofing the design with additional safety.'

Other technical documents also allude to the building potentially being used as dwellings. The Noise Assessment refers to the proposal being reviewed against guidance for new residential development, including the ventilation requirements for dwellings. The assessment also describes the units as 'apartments' at various points. The Transport Assessment also lists nearby local amenities for users of the development (Table 5.1) as a dentist and doctors surgery. It is not clear how a temporary user of the hotel would be able to access particularly the latter of these services. It is also noted within the Planning Statement (Paragraph 5.4) that there is an assumption that users of the hotel may be staying for several months.

The existing ground and first floor plans also show the existing quantum of hotel administration and support facilities for the existing 170-bedroom hotel. This includes multiple staff offices, general manager offices, storerooms, dining and changing facilities for staff. It is also noted that there are back of house facilities on every floor. Whilst there are lots of public facilities (e.g. restaurant, gym, swimming pool etc.), the proposed significant increase in rooms (265) has been accompanied by a reduction in the quantum of hotel administration and support facilities. There is only a small management office and laundry area at ground floor, with one unannotated back of house area retained within the existing hotel on each floor. There is no new back of house to support the uplift of rooms within the new eastern or western sections.

The information above would indicate that there is a high possibility of users of these units being able to occupy them for extended periods of time, including beyond the 90-day rule. This is a pan-London issue that is becoming more prevalent. A draft LPG on Large-scale Purpose-built Shared Living was consulted on in January 2022 and proposes a move towards maximum space standards to reduce the likelihood of these being used as self-contained homes.

If the new units were to be defined as C3 bedrooms, this would have notable implications for their acceptability, including the following:

- An affordable housing requirement.
- An increase charge under the Community Infrastructure Levy (CIL).
- Alternative planning obligations (e.g. public open space contribution).
- Non-conformity with housing mix policies in the Development Plan.
- Non-conformity with design standards (e.g. private amenity space, number of cores, outlook, space standards).
- Different tests and assessments in relation to car parking, trip generation, cycle parking, waste management etc.

Notwithstanding the above, I have provided the following comments on the premise of 265 new hotel bedrooms. Paragraph 87 of the National Planning Policy Framework (2021) outlines that a sequential test should be applied to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Hotels are listed as a main town centre use within the Glossary.

Policy E10 of the London Plan (2021) outlines that in outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London. Whilst the site is located just within the Heathrow Opportunity Area (See London Plan Figure 2.10), the policy is clear that a sequential approach should still be taken. Policy E2 of the Local Plan: Part 1 (2012) outlines that the Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

Paragraph 6.10.2 refers to the GLA Economics Working Paper 88 (2017) and estimates that London

will need a net increase in 58,000 bedrooms of serviced accommodation between 2015 - 2041, which is an average of 2,230 bedrooms per annum. It should be noted that these estimates are both pre COVID-Pandemic and based on a central scenario that includes the Heathrow Airport Northwest Runway expansion. It is therefore assumed that this overall estimate may now be overstated in light of current events, although they remain the most recent adopted figures. On a borough level, Hillingdon has the 3rd highest projected net demand at 4,947 rooms or 8.5% of the total share. As of 2015, almost one third of the serviced accommodation rooms in outer London were located in Hillingdon, predominantly around Heathrow Airport.

The proposal includes a significant uplift in the number of hotel bedrooms and hotel floorspace on the site. The uplift is of such an extent that it could reasonably be accommodated on a new site within or on the edge of a town centre location, as required by national, regional and local policy. The applicant has submitted a sequential test which seeks to demonstrate that there are no available sites in sequentially preferable locations. Whilst I would disagree with some assumptions and elements of the assessment, it does not provide any new evidence to fundamentally contradict the above. The Council does not hold any information to suggest that an increase in hotel rooms of the magnitude envisaged through the Development Plan could be accommodated in the town centres of Hayes, Uxbridge or nearby town centres outside of the London Borough of Hillingdon. Whilst the Council is aware and supportive of existing and proposed hotels within its town centres, they are not of a scale to accommodate the level of demand outlined within the Development Plan.

The Development Plan (Policy DME 5 and Policy E10) also outlines that hotels should be located in sustainable locations which are well-connected by public transport. The site is located in PTAL 3 and has bus access towards nearby town centres. Access to Heathrow Airport and central London is possible via Elizabeth Line stations at Hayes & Harlington and Southall, although this would be a less attractive journey for some. Noting the existing use on the site, it is not considered that an objection could be upheld on this basis.

Whilst the site is designated as part of a Strategic Industrial Location (SIL), there is no evidence that it has been utilised recently for any of the SIL compliant uses listed within Policy E4 of the London Plan (2021). It has been utilised in recent years as a hotel, having been converted from a large office block. Furthermore, the proposal would include the introduction of new light industrial or research and development floorspace, which is supported through Policy E4 of the London Plan (2021). Therefore, no objection is raised to the principle of additional hotel bedrooms (C1) and light industrial or research and development floorspace (E(g)(i) (ii)) in this location.

The proposal outlines that it would include a modest amount of new industrial floorspace at the ground floor. It does not outline what the proposed use class would be. The site is located within a Strategic Industrial Location (SIL) and therefore there is support within the development plan for E(g)(ii) and E(g)(iii) floorspace. This will need to be conditioned to restrict this floorspace from other uses within Use Class E, noting that these other uses will include main town centre uses that are not appropriate in these locations.

There are still concerns about the overall useability of this floorspace. There are only 7 car parking spaces for 16 units. There is also only one small shared loading bay for all of the units to share. However, I would not consider this to be a reason in itself for refusal.

URBAN DESIGN/CONSERVATION OFFICER (20-03-22): There are significant problems developing the site as proposed with the retention of the existing Hyatt Hotel building at the centre of the site. The proposed perimeter block and the retained tower block have an extremely uncomfortable juxtaposition resulting in a poorly conceived cramped form of development delivering amenity issues. Revisions are needed to ensure the proposed building sits more comfortably within the townscape with a positive interface with adjacent buildings.

To gauge appropriate level of development 'plot coverage' should be calculated in accordance with the National Model Design Codes Part 2 page 30. As previously commented at pre-application stage, it is considered the proposals represent over development of the site. The implications of this are discussed in further sections of the report.

The site is designated as a Strategic Industrial Location (SIL) with an existing hotel use established through the extant consent. These uses can include industrial type activities that create toxic smoke/air pollutants and noise disturbance and operate on a 24 hour basis.

The proposals combine light industrial, and hotel uses within the site on the ground and first floor. It is stated within the submission that a clear internal separation will be employed. While the creation of a mixed-use development is supported it needs to be demonstrated that any toxic smoke/air pollutants disturbance produced by light industrial users will not adversely affect the hotel users. It is noted that noise attenuation to minimise external noise spill and prevent transfer to hotel above has been employed.

Further revisions are needed to ensure all the units receive direct daylight and the hotel stair cores within the part of the building dedicated to light industry are relocated.

The shared communal space for both uses has limited amenity value due to the height of the surrounding buildings and size of the space of 16 x 6m. This is discussed further in the next section of the comments.

The proposals retain the existing building centrally located within the site with a slight increase in height. New built form is proposed edging the site to deliver a perimeter block. The central block divides the perimeter block creating inherent over densification and building separation issues between the existing central block and the new built form elements. These include;

- An eastern courtyard of 13.5m wide reducing to 11m with the external walkway. This space is edged with the existing tower of 13 storey opposite a building of seven storeys.
- A western courtyard of between 19 - 23m reducing to 17-21m with the external walkway. This space is edged with the existing tower of 13 storey opposite a building of six storeys.

The nationally accepted separation distance is 21m window to window for two 2 storey buildings facing each other. This distance should be increased with additional storeys. The separation distance combined with the heights of the buildings either side courtyard spaces result in amenity issues. This include;

- Overshadowing of the courtyard space as demonstrated in daylight/sunlight report.
- Overbearing building surrounding the courtyards. These spaces are visually dominated by the railing to the walkways surrounding the space.

Additionally, the space between the buildings will potentially create;

- Daylight/sunlight issues for the proposed hotel rooms. The daylight/sunlight report has failed to assess the proposed building, and it has been demonstrated there will be impacts on the neighbouring properties.
- Noise issues within the courtyard spaces. While it is acknowledged a noise report has been produced to assess the noise issues for the north and west elevations, the noise report has not assessed the acoustics within the courtyard areas.

Accordingly, the scheme fails to comply an appropriate separation distance which delivers amenity issues of dark overshadowed courtyard spaces which are visually dominated with the railing for the walkways, with potential daylight/sunlight and noise issues. This approach fails to comply with Policy

D3 of the London Plan which states that development proposals should:

- deliver appropriate outlook, privacy and amenity
- provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- help prevent or mitigate the impacts of noise and poor air quality
- achieve indoor and outdoor environments that are comfortable and inviting for people to use

The site layout to create a perimeter block is deployed in normal circumstances where buildings face outwards onto the surrounding streets, this creates a clear distinction between public front and private backs of the buildings. This site is only surrounded on two sides with roads. This results in the eastern hotel elevation frontage facing directly into the side elevation of 15-17 Uxbridge Road and rear frontage facing a light industrial site side building elevation and car park. This confused place based form of building fronts addressing building flanks failing to comply with good urban design principles and prejudices the redevelopment of the site to the south. The current arrangement needs further consideration particularly as the daylight/sunlight report records impacts on the neighbouring consented scheme. More information is requested on the use of the access road along the eastern side of the site and the proposed boundary treatment.

Lastly, the staggered building arrangement which gives greater articulation/variation in architectural expression proposed to reduce the massing in street views delivers a varied public realm width along the building front. The building line should be more consistent which is appropriate to the context and sufficient to allow large trees along the whole frontage. It is considered that the tower extension protrudes too far beyond the building line.

The internal layout locates two cycle stores within the buildings along the Uxbridge Road frontage. This frontage should deliver an active frontage with servicing elements such as cycle stores located along the secondary elevations or to the rear of the building.

The proposed redevelopment/extensions to the existing tower of 12 storey would result in an increase to 14 storeys (including plant) to the existing hotel building. The new buildings/extensions heights would range between 6-8 storeys tapering from 8 storey along Uxbridge Road to 6 to the rear.

The prevailing height north of Uxbridge Road is 2 storey residential properties with mostly large single storey industrial building south of Uxbridge Road. This existing building is a marker building within the townscape. The adjacent site will deliver an additional marker building.

It is considered that the shoulder/Uxbridge Road frontage buildings either side of the tower at 8-storeys are too close in height to the tower and should be lowered to ensure the tower remains a marker building within the townscape. This approach would fit more comfortably with the context along Uxbridge Road which has a broadly three storey prevailing height. Although it is acknowledged that more recent developments along this primary route are between 4 and 6 storeys, usually with a top storey set back.

Reducing the Uxbridge frontage buildings would reduce the visual impact of the overly 'blocky' massing of the proposed buildings around the tower. This visual impact can be seen in View 6, View 8 and views from Minet Park shown within the Townscape and Visual Impact Assessment.

The proposals should be revised to lower the two 'C' shaped blocks around the tower and taper more appropriately to the scale of the industrial buildings to the south. This approach would have the additional bonus of reducing the amenity issues within the courtyards.

It is noted that the proposals sought to break the overall mass down through a push and pull

technique to increase the definition of the individual blocks. The technique should be further employed to:

- pull the north east corner further into the site to create an improved interface with the adjacent site and;
- reduce the prominence of the northwest corner which juts too far forward on the corner.

It should be noted that the depth of the adjacent 15-17 Uxbridge Road tower allows it to read as a finger block within the townscape.

The proposal for increased height on the central block to match the consented scheme next door and the two-storey tall base along Uxbridge Road and Springfield Road is supported.

The architectural expression delivers consistent application of framing to achieve vertical emphasis with secondary horizontal grid to deliver a unifying architecture articulation. This approach is supported as it delivers facades with a generous depth which creates visual interest. Clarification is sought on the reveal depths.

The simple, robust palette of pigmented concrete for the main body of the building with areas of glazing is accepted.

Careful consideration needs to be applied to the walkway balustrading as this dominates the internal elevations.

The landscape proposals for the courtyards and vertical greening components are supported, however the long-term viability of planting in these spaces due to the light levels is questioned. Additionally, the small trees and shrubs are not considered to be of an appropriate scale in relation to the surrounding buildings.

Lastly, the naturalistic tree planting along Springfield Road should be more appropriate to the urban context rather than the park context particularly as the wavy footpaths between trees are likely to create desire line trampling of the planting.

URBAN DESIGN/CONSERVATION OFFICER (04-04-23): In my previous comments, I was concerned that there would be daylight/sunlight and noise issues for the Hotel users. I acknowledge the daylight/sunlight and noise standards that apply to residential use do not apply to Hotel use.

Accordingly, my concerns regarding these issues can only be considered if this application was seeking change of use of the Hotel.

Further, it is understood that the applicant has worked proactively to resolve issues raised by both the GLA and Hillingdon Urban Designers to deliver the latest iteration of the proposals. While my view remains as expressed in the comments, I acknowledge that the approach shown in this application was previously agreed with the Hillingdon and GLA Urban Designer.

WASTE STRATEGY OFFICER (10-11-22): Please ensure that there is sufficient capacity for all of the waste that will be generated in the hotel and commercial use units. The council highly recommend an even split of recycling and refuse in the bin store and also capacity for food waste recycling. Please ensure that there is sufficient space in the bin store for movement of operatives and containers and that the door has sufficient space either side for transporting the containers.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

Paragraph 81 of the NPPF sets out that planning decisions should help create the conditions in which businesses can invest, expand and adapt and significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

In this regard, Policy GG2 of the London Plan (Making the best use of land) states that to create successful sustainable mixed-use places, those involved in planning and development must enable the development of brownfield land, particularly on sites within and on the edge of town centres, as well as utilising small sites wherever possible and sites which are well connected by existing or planned public transport. Additionally, Policy GG5 of the London Plan (Growing a good economy) sets out that boroughs should plan for sufficient employment and industrial space in the right locations to support economic development and regeneration, as well as ensuring that physical and social infrastructure is provided to support London's growth.

Policy E10 of the London Plan (Visitor infrastructure) seeks to enhance and extend the supply and quality of visitor accommodation within town centres and Opportunity Areas across London, but particularly in parts of outer London which are well-connected by public transport, taking into account the needs of business as well as leisure visitors. At a borough level, Policy E2 of the Hillingdon Local Plan: Part 1 (Location of Employment Growth) outlines that the Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

Moreover, noting that the tourism sector accounts for above average employment within the borough, the supporting text to Policy DME 4 of the Hillingdon Local Plan: Part 2 (Visitor Attractions) explains how tourism is an important part of Hillingdon's local economy, with key sectors being the business and conference market, transit trade (visitors stopping in Hillingdon en-route to another destination) and the leisure market. Additionally, Policy DME 5 of the Hillingdon Local Plan: Part 2 (Hotels and Visitor Accommodation) sets out that a range of visitor accommodation, conference and related uses in accessible and sustainable locations will be supported, provided that proposals are designed to a high standard, do not lead to a significant loss of residential amenity and provide wheelchair accessible accommodation.

However, whilst the above policies provide a general backing for new employment floorspace and promote a healthy visitor accommodation sector, it is clear that new employment-generating developments should be planned in the "right" locations, which for hotel developments is generally town centres (and Opportunity Areas subject to a sequential test). This is explained through Policies SD6, SD7 and SD8 of the London Plan, which relate to developments affecting the town centre network, which have at their heart the 'town centre first' principles.

Policy SD6 of the London Plan (Town centres and high streets) states that the vitality and viability of London's varied town centres should be promoted and enhanced by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses. Main town centre uses cover quite a broad remit, however relevant to this application include hotels and conference facilities. Policy SD6 further sets out that tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted.

Policy SD7 of the London Plan (Town centres: development principles and Development Plan Documents) requires boroughs to adopt the 'town centres first' approach to applications for main town centre uses outside of designated town centres, which means boroughs should discourage most non-residential, out-of-centre developments. Out-of-centre developments can be particularly detrimental to town centres, undermining their economic performance, local character, and the accessibility they provide to a broad range of services, whilst also encouraging an increase in private vehicle trips away from the established amalgamation of shops and services, and away from areas of higher levels of public transport.

Where an application for a main town centre use is submitted in an out-of-centre location, in accordance with Paragraph 87 of the NPPF, a sequential test must be submitted to demonstrate that, first, there are no suitable town centre sites which are available, or are expected to become available within a reasonable period, and second, that there are no suitable edge-of-centre sites which are available, or are expected to become available within a reasonable period.

The 'town centre first' approach of the London Plan is enshrined at a borough level through Policy DMTC 1 of the Hillingdon Local Plan: Part 2 (Town Centre Developments) which sets out that 'main town centre uses' will be supported within town centre boundaries, however proposals for 'main town centre' uses in 'out of centre' locations will be resisted and the applicant must demonstrate that there are no more suitable sites and that the proposal will not harm the vitality and viability of the established town centres

Taking London and Hillingdon Local Plan Policies into account together, a sequential test is required to demonstrate there are no sequentially preferable sites within or on the edge of town centres which could accommodate the development as the proposal constitutes an out-of-centre development for a main town centre use, albeit recognising that the site does fall within the Heathrow Opportunity Area's indicative boundaries. This position is recognised by the applicant, who has submitted a Sequential Assessment (dated August 2022) alongside their application.

In addition to its location outside of a town centre (albeit within an Opportunity Area), the application site also falls within the boundaries of the Springfield Road SIL, which is an area of land and premises designed to meet current and future demands for industrial functions, making provision for the varied operational requirements of light and general industry (use classes E(g)(iii) and B2), storage and logistics (use class B8) and other uses which would be inappropriate outside of an industrial setting. Policy E4 of the London Plan (Land for industry, logistics and services to support London's economic function) states in this regard that the retention, enhancement and provision of additional industrial capacity should be particularly prioritised in locations that are accessible to the strategic road network or have potential for the transport of goods by rail or water transport and proposals which seek to provide capacity for micro, small and medium-sized enterprises should be encouraged.

Additionally, Policy E5 of the London Plan (Strategic Industrial Locations) sets out that SILs should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial and logistics capacity for uses that support the functioning of London's economy. As such, proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out under Policy E4. Moreover, proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a

24-hour basis.

Policy E7 of the London Plan (Industrial intensification, co-location and substitution) sets out that the intensification of uses in Use Classes E(g)(iii), B2 and B8 (occupying all categories of industrial land) should be proactively encouraged through the introduction of small units, the development of multi-storey schemes, the addition of basements and the more efficient use of land through higher plot ratios. Intensification can be used to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. It should be noted in this regard that Policy E7 makes clear that co-locating residential and industrial uses may be appropriate in LSISs (but will not normally be appropriate within SILs), and should normally be plan-led.

Where mixed-use developments are proposed for sites within, or on the edge of SILs, the industrial and related activities on-site and in surrounding parts of the SIL must not be compromised in terms of their long-term efficient function, access, service arrangements and times of operation, noting that many industrial businesses have 7-day/24-hour access and operational requirements. Additionally, the proposed accommodation must include mitigation to ensure compliance with the relevant standards for safety and security, vibrations and noise (having regard to the agent of change principles), potential contaminated land and air quality.

The supporting text to Policy E7 outlines that all boroughs are encouraged to explore the potential to intensify industrial activities on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses, however, does advise that SILs should be reserved for industrial (and industrial-related) functions only.

At a borough level, Policy E1 of the Hillingdon Local Plan: Part 1 (Managing the Supply of Employment Land) sets out that the Council will accommodate growth by protecting Strategic Industrial Locations (SILs), Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations (LSEL) including the designation of almost 14 hectares of new employment land. The managed release of some employment land will be allowed in areas identified as appropriate through the development plan process. In addition, Policy E2 of the Hillingdon Local Plan: Part 1 (Location of Employment Growth) sets out that the Council will accommodate 9,000 new jobs during the plan period, with most of this employment growth directed towards suitable sites in the Heathrow Opportunity Area, SILs, LSEs, LSISs, Uxbridge Town Centre and Hayes Town Centre with a particular focus around transport nodes.

Policy DME 1 of the Hillingdon Local Plan: Part 2 (Employment Uses on Designated Employment Sites) outlines that of the four SILs within the borough, three are designated as Preferred Industrial locations (PILs) and one is designated as an Industrial Business Park (IBP). The Springfield Road SIL is subcategorised as a PIL, which is suitable for general industrial, storage and distribution and other industrial related uses (i.e. mainly Use Classes E(g)(iii), B2 and B8), and Policy DME 1 clearly states that the Council will support employment proposals in SILs for these uses.

Taking the above policy considerations together, the principle of development has two main aspects; the expansion of an existing hotel within an Opportunity Area but outside of a town centre, and the introduction and co-location of industrial uses within a SIL as part of the hotel-led application.

Turning first to the proposed expansion of the hotel, which, as noted above, is already present on site as an operational hotel with 170 rooms following the change of use from an office building, approved in 2014. The site falls within a SIL, and therefore the existing hotel is an inappropriate use for this location, as SILs should generally be reserved for industrial and industrial-related functions only. However, as the lawful use of the site is for a hotel it would not be reasonable to prevent an existing facility from expanding, having regard to Policies GG2 and GG5 of the London Plan which encourage the redevelopment of brownfield sites in well-connected locations to support economic development and regeneration. As such, whilst the C1 use remains an inappropriate use for this site, the significant uplift in hotel floorspace could be considered acceptable in principle, subject to passing the Sequential Assessment required by the NPPF, the London Plan and the Hillingdon Local Plan (as discussed in greater detail below), as this would be in line with the general thrust of development plan policies to enable businesses to expand and promote investment in the borough.

The Sequential Assessment has been reviewed by the Council's Planning Policy Officer, who considers that despite some disputed assumptions and elements of the submitted assessment, the overall conclusions are considered acceptable, and that no sequentially preferable sites can be identified. In this regard, it is noted that because of the borough's unique siting, close to the major transport hub at Heathrow Airport and with easy access to the strategic road network into and out of London, the borough of Hillingdon experiences very high demand for hotel accommodation, and it is unlikely that all of this demand can be accommodated within town centres alone and therefore some edge-of or out-of-centre hotel developments would probably be required to meet expected growth targets.

The site further falls within the indicative boundaries of the Heathrow Opportunity Area, which broadly extends northwards from Heathrow Airport to Uxbridge Road (which forms the northern boundary of this site) and has an indicative capacity of 13,000 additional homes and 11,000 additional jobs. Opportunity Areas are identified as locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. In this regard, Policy SD1 of the London Plan (Opportunity Areas) sets out that developments which create employment opportunities and improve housing choice for Londoners within Opportunity Areas, alongside the provision of infrastructure, should be supported to sustain growth and create mixed communities, and further promotes the intensification and more efficient use of SILs within Opportunity Areas

On this basis, it is considered that the proposed expansion of the hotel is acceptable in land-use terms, having regard to the existing C1 use across the whole site.

In addition to the substantial increase in hotel floorspace, the proposal also seeks to introduce 1,318 sqm of light industrial floorspace, falling within the E(g)(iii) use class, to be provided at ground floor and mezzanine level beneath the podium courtyard, comprising 15 units. A condition restricting the use of this floorspace to either E(g)(ii) (research and development) or E(g)(iii) is therefore recommended. Whilst this level of industrial floorspace is relatively small in the context of the proposed hotel use on the site, the introduction of industrial floorspace, especially with units geared towards catering for small and medium enterprises (or start-ups), is wholly supported and represents a positive addition to the overall proposal. Given the site's location within a SIL, the introduction of SIL-compliant uses would improve the overall capacity and viability of the wider SIL, creating opportunities for employment and reinforcing the SIL's role as the main reservoir of industrial functions and land.

The provision of industrial floorspace would further be in line with the general thrust of the co-location and intensification policies within the London Plan, albeit Policy E7 does specify that co-location should usually be reserved for Locally Significant Industrial Sites (LSISs), rather than SILs, as non-industrial uses are generally inappropriate for a heavy industrial setting. In this respect, however, it is recognised that the site sits at the northern edge of the SIL, with a number of existing residential uses nearby, and that a hotel has been operational on the site since 2016, and therefore it can be assumed to some extent that the typical issues associated with locating sleeping accommodation near to industrial uses (e.g. noise and lack of nearby amenities) would not raise significant concerns for a larger building within the same use class from the same site, and therefore the proposed expansion is unlikely to negatively affect either the continued operation of the surrounding SIL uses or lead to noise complaints from future users of the development. It is further noted the GLA support the proposed uses across the site, including the introduction of industrial uses, and therefore a refusal on this minor conflict with Policy E7 would not be warranted.

It is further of relevance that this part of the SIL, facing Uxbridge Road, is likely to experience a fairly significant change in character in the coming years, having regard to the recently approved permission next door to the east at 15-17 Uxbridge Road (Ref: 69827/APP/2021/1565) for a 13-storey apart-hotel with 174 rooms (falling within the C1 use class). An apart-hotel offers serviced accommodation in the same way as a standard hotel, but offers more self-contained accommodation usually including kitchen facilities to enable longer stays than is typical of a standard hotel.

In respect of the proposed development on this site, the operation of the new hotel will function, in many ways, like the adjacent apart-hotel scheme, with on-site amenities in the form of a restaurant, bar, lounge, gym and spa at first floor level and an external swimming pool at podium level within the courtyard. The submission also sets out that some future guests would probably stay for extended periods of time, beyond 90 days in a calendar year, and the Planning Policy Officer's comments raise concerns that the site could be used, in operation, as a use more akin to a C3 (residential) use, or potentially as Purpose-Built Shared Living accommodation (PBSL), which is a more flexible version of traditional C3 housing. The presence of cooking facilities within individual rooms, the size of some of the larger rooms themselves and the access/egress arrangements for guests using the building further indicate that it could be possible to use the site for a residential or PBSL use, with on-site amenities converted to shared facilities and the courtyards functioning as external amenity space.

However, planning case law and recent appeal decisions indicate that local planning authorities should not refuse permission if, following implementation of the permission, they consider that a site could be used for an alternative use to the use being applied for, if it could also be operationally used in the way put forward by the applicant, and that to refuse permission on this basis alone would constitute unreasonable behaviour. This is because a local planning authority can control the operation of the hotel through the use of conditions and planning obligations, if considered necessary to ensure that the operational use of the development remains within the C1 use class. Additionally, if, in the view of the local planning authority, the site is either operating in contravention of the conditions and obligations associated with the permission, or the hotel is operating within any use class other than C1, the local planning authority can take enforcement action to ensure the site functions as applied for and approved.

In this instance, to address some of the concerns raised and to ensure that the proposed

development continues to function as a hotel, a draft Hotel Management Strategy has been agreed which places limits on the type of kitchen facilities (kitchenette fittings in the bedrooms shall be limited to a two-ring hob) and access arrangements (all guests shall have to use the main lobby) and further prohibits the use of Assured Hold Tenancies (ASTs). This Hotel Management Strategy would be secured as an obligation through a legal agreement, and additional conditions restricting the means of access and confirming the appropriate uses across the site are recommended.

Overall, whilst there are some minor conflicts with planning policy, and the concerns regarding the proposed use are recognised, it is considered that the proposal as whole is acceptable in principle and generally complies with the intentions of the London Plan and Hillingdon Local Plan in respect of creating employment opportunities and promoting local investment, and would bring forward a number of land-use benefits by making much more effective use of a brownfield site.

7.02 Density of the proposed development

Residential density is not relevant to an application for the proposed C1 and E(g)(iii) uses.

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

No designated or non-designated heritage assets would be affected by the proposal.

7.04 Airport safeguarding

Policy DMAV 1 of the Hillingdon Local Plan: Development Management Policies (Safe Operation of Airports) sets out that the council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the relevant airport operator on proposals in the relevant safeguarded areas. In this instance, the requirement to consult on airport safeguarding is for any proposal exceeding 15 metres, 45 metres and 45.7 metres for Heathrow, NATS, and the Ministry of Defence (RAF Northolt) respectively.

Across most of the site, building heights would be below the height of the pre-existing building, however as the proposal would also increase the height of the pre-existing building and exceeds the consultation requirement, Heathrow, RAF Northolt, and NATS have been consulted. Heathrow Airport and NATS both confirmed they have no objection to the proposal on safeguarding grounds. The response from the MoD (RAF Northolt) confirmed they also had no objection, subject to a condition being included requiring the submission of a Bird Hazard Management Plan and to be notified of the use of cranes for construction purposes, and these conditions have been imposed.

7.05 Impact on the green belt

The proposed development lies outside the Green Belt, and is located on the northern edge of a SIL, within a fairly built-up area, albeit the surrounding buildings are generally of a much lower scale than the existing (and proposed) hotel.

The proposal would be clearly visible from within the Green Belt between the SIL and the A312 to the west, which extends from Yeading Brook in the south to Uxbridge Road in the north, however the proposed development would not affect the Green Belt's permanent openness, as openness relates to the absence of built form on the land itself and not views from within the Green Belt.

7.07 Impact on the character & appearance of the area

Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site whilst the design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and

capacity for growth, including existing and planned supporting infrastructure capacity. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 of the London Plan. In areas of comparatively low densities, incremental densification should be actively encouraged to achieve a change in densities in the most appropriate way.

As such, proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape with due regard to building types, forms, proportions and the street hierarchy. Proposals should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings that are aligned with peoples' movement patterns and desire lines in the area, be street-based with clearly defined public and private environments, and facilitate efficient servicing and maintenance of buildings and the public realm that minimise negative impacts on the environment, public realm and vulnerable road users.

The proposal should also be considered against Policy D9 of the London Plan (Tall buildings), which sets out that the definition of a tall building is defined at a local level, depending on the characteristics of the surrounding area, but in any case, should not include developments of less than 6 storeys or 18 metres above ground level, and are generally those that are substantially taller than their surroundings or cause a significant change to the skyline. Where a tall building is proposed, the visual, functional and environmental impacts of the proposal should be carefully considered, including the cumulative impacts with other existing, planned or consented developments in the vicinity. The supporting text to Policy D9 sets out that the higher the building, the greater the level of scrutiny that is required of its design, because of the greater potential impacts.

Policy D9 further states that whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm.

Policy D9 should further be considered in the context of Policy DMHB 10 of the Hillingdon Local Plan: Development Management Policies (High Buildings and Structures) which states that any proposal for a tall building must respond to its local context, and notes that tall buildings can be used to create or emphasise a point of civic or visual significance. Within the borough, tall buildings should generally be located within Uxbridge or Hayes Town Centres, as outside these two centres, the character of the borough is mainly low rise and suburban in nature, and tall buildings are generally inappropriate within suburban settings. Policy DMHB 10 further states that tall buildings should be located in areas of higher public transport accessibility and be proportionate in terms of their overall height, form, massing and footprint, with particular consideration given to their integration with the local street network, nearby public spaces and their impact on local views.

In addition, Policy BE1 of the Hillingdon Local Plan: Part 2 (Built Environment) sets out that,

in order to create successful and sustainable neighbourhoods, new development (including new buildings, alterations and extensions) should be of a high quality design which enhances the local distinctiveness of the area and contributes to a sense of place. As such, proposals should be designed to be appropriate to the context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials.

As set out above, the surrounding area has a very mixed character, with Uxbridge Road acting as a partition between the predominantly residential uses to the north and the commercial and industrial uses to the south. This is visible in the architecture and scale of the buildings on the opposite sides of Uxbridge Road, with two and three storey red brick or rendered houses characterising the residential areas to the north and large shed-style warehouse buildings characterising the areas to the south. In this respect, as a tall building, the existing Hyatt Place building is somewhat of an anomaly in the streetscape because of its scale and materiality, and because of this, it is one of the most visible buildings in this part of the borough, especially when approaching the site from the east or west along Uxbridge Road.

The proposal would result in a substantial uplift in floorspace, with the resultant development comprising 19,054 sqm of hotel floorspace and 1,318 sqm of light industrial floorspace, compared to an existing GIA of 9885 sqm (i.e. the development would create an additional 10,487 sqm). Unsurprisingly, to accommodate such a large increase in floorspace, a significant amount of the site would be developed on, with the proposal covering nearly the entire site, excluding the parking areas to the south and east, and introducing two perimeter-style 'C' shaped blocks to the east and west of the existing central building, which itself would be increased by two storeys.

It is considered that this proposed layout makes efficient use of the site, recognising that the scheme introduces industrial uses onto a site within a SIL alongside the increase in hotel accommodation and that the large footprint is integral to allowing space for these industrial units within the site. The layout further allows sufficient room for deliveries and servicing to the rear, accessed from Springfield Road, and overall appears a sensible approach to optimise redevelopment of the site.

Alongside the increase in footprint, the proposal would further result in a substantial increase in scale across the site, with two 8-storey perimeter blocks flanking a central 14-storey tower. As an existing tall building which is increasing in height (alongside the erection of the perimeter blocks), the proposal should be assessed against the requirements of Policy D9 of the London Plan and Policy DMHB 10 of the Hillingdon Local Plan. Taken together, Policy D9 and Policy DMHB 10 set out that within the borough, tall buildings should generally be located within Uxbridge or Hayes Town Centres, as outside these two centres, the character of the borough is mainly low rise and suburban in nature.

This is recognised in the GLA's Stage 1 comments, and it is acknowledged that the proposal would conflict with the locational requirements of Policy D9 and DMHB 10, and, if the existing site was cleared and the permission at 15-17 Uxbridge Road did not exist, it is likely that the introduction of a building ranging from 8 to 14 storeys would be considered unacceptable. However, both the scale of the existing building and the consented permission at 15-17 Uxbridge Road to the east are material considerations and it is recognised that there is scope to create a small cluster of tall buildings in this location because of the pre-existing tall building on-site. Moreover, the submitted views analysis within the Town and Visual Impact Assessment demonstrates that whilst the proposal

would be a much more visible structure because of the increase in scale, the overall impact to the skyline would be fairly limited because the existing building is already the dominant structure in most of the existing views.

It is further recognised that the detailed architectural features and the overall materiality of the proposal would be of a high quality, with a clearly defined base, middle and top. This helps to reduce the sense of bulk and provide a sense of human scale. The breaks between the blocks further helps to reduce the scale of the proposal, allowing glimpses from the street into the centre of the site, providing some sense of visual permeability.

Overall, the architectural quality of the proposal is considered to be acceptable and the proposal is considered to generally comply with the intentions of the London Plan and Hillingdon Local Plan in respect of design.

7.08 Impact on neighbours

Policy DMHB 11 of the Hillingdon Local Plan: Development Management Policies and Policy BE1 of the Hillingdon Local Plan: Strategic Policies both seek to ensure that new development does not adversely impact on the residential amenity of neighbouring properties.

Furthermore, the Mayor's Housing SPG sets out that proposals should limit the harm to neighbouring properties, whilst recognising that to comply with policies seeking the optimal use of land, some development proposals may be allowed even where harm has been identified.

IMPACTS ON NATURAL LIGHT AND OUTLOOK

Policy DMHB 11 sets out that proposals must carefully consider their layout and massing in order to ensure that new development does not result in a significantly increased sense of enclosure or loss of outlook. When assessing impacts related to the loss of natural light, the Mayor's Housing SPG advises that avoiding harm to habitable rooms is the priority, which are usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bathrooms or toilet facilities, service rooms, corridors, laundries, hallways, utility rooms or similar spaces are excluded from this definition of habitable rooms.

A standardised method of assessment for calculating the level of impact to neighbouring buildings is prescribed within the BRE's guide to good practice, titled 'Site Layout Planning for Daylight and Sunlight' (June 2022). This guidance document discusses various methods of assessing a proposals impact on access to natural light, and sets out a number of thresholds which, if exceeded, would probably have a noticeable impact on natural light to neighbouring properties.

Broadly, BRE guidance recommends that an assessment considers the likely significant effects to daylight for neighbouring buildings in terms of Vertical Sky Component (VSC) whilst an assessment of sunlight should also be undertaken in relation to neighbouring buildings in terms of Average Probable Sunlight Hours (APSH) alongside an assessment of overshadowing.

VSC is a measure of the amount of sky visible from the midpoint of a window, where the area of visible sky is expressed as a percentage of an unobstructed hemisphere of sky. This percentage therefore represents the amount of daylight available for that particular window, and BRE guidance recommends that a VSC of 27% should be maintained,

however, this is not always achievable in dense urban environments. In addition to the amount of sky visible, Relative VSC (rVSC) is a measure of the reduction of visible daylight, and BRE guidance recommends that a development proposal would have a negligible impact if the reduction in rVSC is between 0 - 20%, would have minor significance if the reduction is between 21 - 30%, would have moderate significance if the reduction is between 31 - 40% and would have substantial significance if the reduction is above 40%.

APSH is a metric to measure sunlight and is based on the total number of hours in the year that the sun is expected to shine on unobstructed ground (allowing for average levels of cloudiness for the location in question, based on sunshine probability data). The sunlight reaching a window is then quantified as a percentage of this unobstructed annual total. If a room can receive more than 25% of annual probable sunlight hours (APSH), including at least 5% of APSH in the winter months between 21st September and 21st March, then it should still receive enough sunlight, and, if the overall annual loss of APSH is 4% or less, the loss of sunlight is small. If the target APSH values are not met and are less than 0.8 times their former value, either over the whole year or just in the winter months and the overall annual loss is greater than 4% of APSH, then the occupants of the existing building will notice the loss of sunlight

To assess impacts on sunlight, the BRE guidance suggests that all main living rooms of dwellings should be tested if they have a window facing within 90° of due south, whilst kitchens and bedrooms only need to be tested if they provide significant living spaces.

In support of the application, a Daylight and Sunlight Report (August 2022) has been submitted and reviewed by Lambert Smith Hampton on behalf of the Council. The review by Lambert Smith Hampton sets out that the proposed methodology is acceptable and the results are accurate. The Daylight and Sunlight Report assesses the residential units on the northern side of Uxbridge Road (starting at 60, up to 156), as well as the impact on the consented development adjacent at 15-17 Uxbridge Road for an apart-hotel.

The results show that the proposal would not have a noticeable impact on Nos. 60 to 150 and No. 156 Uxbridge Road in terms of access to natural light. For the 30 affected windows at Nos. 124-146 Uxbridge Road, which all form part of the short parade of shops directly north of the site and their residential flats above, all fall short of the target values, and the proposal would therefore lead to some loss of daylight access for these properties. It is noted, however, that where the windows fall short of the target VSC value (i.e. a reduction of more than 20%), the majority of reductions would still be relatively small (between 20% and 27%), which is recognised as being of minor significance, and is considered an acceptable impact in this instance, although 3 rooms at Nos. 140-142 and 3 rooms at Nos. 136-138 see slightly higher reductions at 32-37%.

Overall, whilst some impacts to residential properties nearby would be noticeable, this would not warrant a reason for refusal as any redevelopment which makes efficient use of the site in a built up area is likely to result in some daylight or sunlight impacts, and overall, the impacts are relatively minor.

The proposal has assessed the impact of the development on the consented apart-hotel scheme at 15-17 Uxbridge Road to the east of the site. Of the 144 windows tested, 132 meet target values, with 12 windows falling short. All 12 windows are located on the west elevation which looks out onto the application site and there are 2 windows per floor from the 1st to 6th floors, with two windows serving 1 studio on each floor. Apart-hotels (as a C1 use) do not benefit from the same levels of protection as residential uses and therefore

whilst there would be a significant impact to 6 bedrooms within the adjacent development, this is considered to have a fairly neutral impact in the planning balance.

IMPACTS ON PRIVACY

The supporting text to Policy DMHB 11 sets out that sufficient privacy for existing residents will be protected by resisting proposals which would introduce an unreasonable level of overlooking between habitable rooms of adjacent residential properties, schools or onto private open spaces. To maintain existing levels of privacy, a minimum separation distance of 21 metres between facing habitable room windows will normally be required, and in some locations, for example where there is a significant difference in ground levels between dwellings, a greater separation distance may be necessary.

As a proposed C1 use, the proposal is unlikely to lead to a significant loss of privacy to nearby dwellings because of the transient nature of guests. In any event, there are relatively few dwellings nearby which could be affected, all of which are sited on the northern side of Uxbridge Road, which itself is relatively wide (with four lanes of traffic and a central verge). Some level of mutual overlooking over roads is normal and would not warrant a reason for refusal even if the proposal were for a C3 (residential use).

On this basis, it is considered that the proposal would not have a significant impact on the privacy of nearby residents.

7.09 Living conditions for future occupiers

As opposed to a proposed C3 (residential) use, there are no prescribed standards for living conditions for C1 (hotel) uses, given the transient nature of guests and because individual rooms are not intended for long-term or permanent habitation. Moreover, hotels are commercial operations which rely on guests enjoying their time and/or finding value for money, and the type of accommodation offered by C1 uses varies widely across London and often depends on guests' personal preferences. As such, beyond providing restrictions to ensure the hotel operates within the C1 use class (as outlined in the draft Hotel Management Strategy), it would not be reasonable to comment on the quality of the rooms offered or impose restrictions on how the hotel would function, as this falls outside the remit of the planning system.

Nevertheless, it is noted that all rooms would receive some level of natural light, the room sizes are generous and include basic cooking facilities, and there are a number of on-site amenities for future guests to enjoy. On this basis, future guests would be afforded a good level of accommodation, however this is neutral in the planning balance.

7.10 Traffic impact, Car/cycle parking, pedestrian safety

TRANSPORT IMPACTS

Policy T1 of the London Plan (Strategic approach to transport) seeks to ensure that development proposals facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by 2041. All development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated. This should be read alongside Policy T2 of the London Plan (Healthy Streets), which requires proposals to demonstrate how they will reduce the dominance of vehicles on London's streets, whether stationary or moving, be permeable by foot and cycle, and connect to local walking and cycling networks as well as public transport.

Moreover, Policy T4 of the London Plan (Assessing and mitigating transport impacts) sets out that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required, transport assessments or statements should be submitted with proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Policy T4 further explains that where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

As part of the submission, a Transport Assessment (September 2022) has been reviewed by the Council and TfL, and it is considered that the approach to assessing trip generation is acceptable, making use of TRICS data where applicable. It is predicted that there would be up to 54 additional vehicle movements at peak times, which could likely be accommodated within the Strategic Network without having a significant impact, however might be felt at a local level on the nearby roads.

As discussed in greater detail below, due to the size of the proposal and the limited on-site parking, a number of measures will be required as mitigation for the potential transport impacts, however it is considered that the proposal as a whole could be managed to ensure that transport impacts are low.

CAR PARKING PROVISION

Policy T6 of the London Plan (Car Parking) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). Car-free developments have no general parking but should still provide disabled persons parking. The maximum standards for car parking outlined in the London Plan take account of PTAL as well as London Plan spatial designations and use classes, and the supporting text further outlines that developments in town centres generally have good access to a range of services within walking distance, and so car-free lifestyles are a realistic option for many people residing there.

Policy T6 makes clear that an absence of local on-street parking controls should not be a barrier to new development, and boroughs should look to implement these controls wherever necessary to allow existing residents to maintain safe and efficient use of their streets, whilst further stating that the redevelopment of sites should reflect the current approach to parking and not be re-provided at previous levels where this exceeds the maximum parking standards.

The maximum car parking standards, disabled persons parking, and the provision of electric or other Ultra-Low Emission vehicles are set out in Policy T6.1 to Policy T6.5 of the London Plan, and relevant to hotels is Policy T6.4 (Hotel and leisure uses parking) and T6.5 (Non-residential disabled persons parking). There are no specific London Plan car parking standards for light industrial uses, however Policy T6.2 (Office Parking) encourages proposed B2 (general industrial) and B8 (storage and distribution) uses to have regard to parking standards for offices, taking into account the generally lower employment densities of industrial uses compared to offices, and is therefore a sensible benchmark to use.

Policy T6.4 sets out that in locations of PTAL 0-3 (such as this site), schemes should be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, with the aim to improve public transport reliability and reduce congestion and traffic levels. Policy T6.5 (Non-residential disabled persons parking) also sets out that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Disabled persons parking bays should be located on firm and level ground, as close as possible to the building entrance or facility they are associated and designated bays should be marked up as disabled persons parking bays from the outset.

Policy DMT6 of the Hillingdon Local Plan Part 2 also requires that parking standards at hotels are assessed on an individual basis, however taxi pick up and set down spaces must be provided as must one coach parking space per 50 rooms. Policy DMT6 also does not specify car parking standards for light industrial uses, however does set out standards for B2 and B8 uses, which again, can be used as a benchmark.

For the proposed 1,318 sqm of industrial floorspace within an Opportunity Area, the maximum number of car parking spaces allowed would be 2 (based on 1 space for every 600 sqm), based on London Plan office standards. Applying the industrial standards of the Hillingdon Local Plan would be very similar at a maximum provision of 3 spaces (based on 1 space for every 500 sqm). The proposal includes 7 parking spaces safeguarded for use by the industrial units, including the 'Zipvan' bay which would be reserved for use by the businesses on site. This provision is above the maximum standards of the London Plan and Hillingdon Local Plan, however given that the industrial floorspace is proposed to be subdivided into 15 smaller units, to predominantly serve SMEs, and noting that E(g)(iii) uses do not have specific standards themselves and the above 'maximum' level is based on either office uses within opportunity areas (London Plan) or B2 and B8 uses (Hillingdon Local Plan), it is considered that 7 spaces (inclusive of a 'Zipvan' bay) would be acceptable to serve the proposed industrial units. In this respect, neither TfL nor the Council's Highways Officer have provided specific comments on the parking spaces for the industrial units, other than to request that appropriate electric vehicle charging provision be secured for these operational bays, which would be secured by way of condition.

As noted above, parking provision for hotels should be assessed on a case-by-case basis having regard to the specific operational requirements of the hotel and PTAL, whilst promoting sustainable travel measures to reduce reliance on private car trips. The proposed development would have a Gross Internal Area (GIA) of 19,054 sqm of hotel floorspace, a very significant net uplift of 9,169 sqm, and would see a site-wide reduction in parking spaces from 70 to 39, with 32 safeguarded for use by the hotel. Of these 32 spaces, 18 would be standard bays and 14 would be wheelchair accessible.

Comments received from TfL indicate that the maximum number of parking spaces allowed by the London Plan would be 19, however it is not clear how this number has been arrived at, and in any event, their comments acknowledge that the provision of 18 standard spaces would be lower than the maximum and is therefore acceptable. Comments from the Council's Highways Officer initially raised an objection to the scheme, on the basis that 32 spaces, of which 14 would be for blue badge holders only, would be insufficient to cater for 435 hotel rooms, leading to significant levels of overspill parking, in an area known to experience very high levels of congestion (especially at school beginning and closing times due to the presence of large educational establishments in the local area). In this respect, the surrounding roads do not have parking controls and future users of the hotel would be able to park on the surrounding roads, including the residential roads to the north of

Uxbridge Road, if they brought a car to the site and didn't use the on-site parking. The Highways Officer's comments further explained that whilst there is scope for a car-lite or car-free hotel redevelopment, the proposal would need to be supported by a suite of measures to ensure that future users are actively discouraged from bringing cars to and from the hotel, appropriate walking and cycling facilities are in place in the local area, and there are genuine alternatives to trip making by private car.

Following discussions between the applicant and the local planning authority, a revised Travel Plan (December 2022) (Rev. A) has been submitted and reviewed by the council. The revised Travel Plan includes a commitment to provide two dedicated minibuses to shuttle hotel guests and employees between the site and key public transport nodes, the provision of a 'Zipvan' bay and sets out targets for a modal shift away from car use for the hotel use. However, despite the improvements to the Travel Plan (full details of which would be secured as an obligation), the proposal could still displace a significant amount of parking onto the surrounding streets, and it is therefore considered necessary to seek a financial contribution to fund consulting on and implementing a parking management scheme for the area, which would, if implemented, effectively prevent any overspill parking onto the surrounding roads, because future users of the hotel or the industrial floorspace would not be entitled to a parking permit if the parking management scheme was introduced. This contribution would be secured as an obligation.

This approach would be in line with Policy T6 of the London Plan which makes clear that an absence of local on-street parking controls should not be a barrier to new development and boroughs should look to implement these controls wherever necessary. This position is confirmed by comments received from TfL and the updated comments received from the Council's Highways Officer.

On this basis, whilst the proposal would result in a significant uplift in floorspace and a significant reduction of on-site parking, the proposal is considered acceptable in respect of parking provision, subject to the recommended conditions and obligations.

CYCLING

Policy T5 of the London Plan (Cycling) sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located.

Developments should provide cycle parking at least in accordance with the minimum standards, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

For proposed light industrial uses, 1 long-stay space for every 250 sqm and 1 short-stay space for every 1,000 sqm would be required. As such, based on the provision of 1,318 sqm of light industrial floorspace, 5 long-stay and 3 short-stay cycle spaces would be required. The proposal includes 32 long-stay spaces, 8 short-stay spaces and 3 cargo cycle spaces for the industrial units, which significantly exceeds the minimum

requirements, and is acceptable. The provision of space for cargo bikes is especially welcomed.

For hotel uses, 1 long-stay space for every 20 bedrooms and 1 short-stay space for every 50 bedrooms would be required. As such, based on the provision of a 435-bedroom hotel, 22 long-stay and 9 short-stay cycle spaces would be required. The proposal includes 22 long-stay and 10 short-stay cycle spaces for the hotel, and this is marginally above the minimum requirements, and is also considered acceptable.

PUBLIC REALM AND ACTIVE TRAVEL IMPROVEMENTS

The submitted Transport Assessment includes an Active Travel Zone Assessment, to identify any areas of deficiency in the walking and cycling environment, and in particular any areas which are likely to be used by future guests, especially noting the very low on-site parking levels. This has been reviewed by the Council and TfL, and it is noted that TfL requested an update to include a night-time assessment. Whilst this update has not been carried out, an area of deficiency identified by the Council's Highways Officer very close to the site and in clear need of improvements (for pedestrian safety and to encourage active travel), and a financial contribution of £160,000 would be secured as an obligation to fund these works.

On this basis, alongside the contribution for the creation of a parking management scheme to prevent overspill parking and a Travel Plan to encourage sustainable modes of travel, it is considered the proposal has the ability to improve the surrounding pedestrian and cycling environment, thereby encouraging active travel for future guests.

7.11 Urban design, access and security

Policy D11 of the London Plan (Safety, security and resilience to emergency) sets out that boroughs should work with the Metropolitan Police Service's 'Design Out Crime' Officers to identify the community safety needs and necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Proposals should seek to maximise building resilience and minimise potential physical risks, and should include measures to design out crime that deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. Measures to design out crime, including counter terrorism measures, should be integral to proposals, taking into account the principles contained in guidance such as the Secured by Design Scheme published by the Police.

Policy BE1 of the Hillingdon Local Plan: Strategic Policies (Built Environment) encourages the creation of safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson, having regard to Secure by Design standards.

As such, a condition requiring the proposed development to achieve secured by design accreditation in consultation with the Metropolitan Police, is included within the officer's recommendation, to ensure the proposal meets the requirements of Policy D11 of the London Plan and Policy BE1 of the Hillingdon Local Plan. On this basis, the proposal is considered acceptable in this regard.

7.12 Disabled access

Policy D5 of the London Plan (Inclusive design) sets out that proposals should achieve the highest standards of accessible and inclusive design by providing high quality people focused spaces that are designed to facilitate social interaction and inclusion, be

convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment, and be able to be entered, used and exited safely, easily and with dignity for all. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building, and proposals should ensure they are compliant with Policy D12 of the Plan (Fire safety) and place fire resilience central to the proposal's design.

Policy E10 of the London Plan further states that either 10% of new bedrooms shall be wheelchair accessible (in accordance with Figurev52, incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice) or 15% shall be accessible rooms (in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice).

Having regard to comments received from the Council's Access Officer, it is acknowledged that the proposed development is fundamentally accessible, however further details and compliance with Policy E10 shall be secured by way of condition.

7.13 Provision of affordable & special needs housing

Not relevant to this application for the proposed C1 and E(g)(iii) uses.

7.14 Trees, landscaping and Ecology

Policy G5 of the London Plan (Urban Greening) states that major developments should 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. The Mayor recommends that boroughs seek an Urban Greening Factor (UGF) target score of 0.3 for developments that are predominately commercial. In broad terms, the UGF is an assessment of the amount, type and value of natural environment provided on site as a proportion of the overall site area. The assessment assigns each landscape type (e.g. Semi-natural vegetation, intensive green roof to depth of 150mm, extensive green roof to depth of 80mm, amenity grassland, etc) with a 'factor' (1, 0.8, 0.7 and 0.4 respectively for the landscapes listed above). These factors are a simplified measure of various benefits provided by soils, vegetation and water based on their potential for rainwater infiltration as a proxy to provide a range of benefits such as improved health, climate change adaption and biodiversity conservation.

In addition, Policy DMHB 14 of the Hillingdon Local Plan: Part 2: (Trees and Landscaping) sets out that all developments will be expected to retain or enhance biodiversity through the protection of existing landscaping, trees and other natural features of merit, and proposals are required to provide a scheme of hard and soft landscaping to demonstrate this. Moreover, the council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover (including the linking of existing fragmented areas) for the benefit of wildlife and a healthier lifestyle.

Furthermore, Policy EM7 of the Hillingdon Local Plan: Part 1 (Biodiversity and Geological Conservation) seeks to protect biodiversity features from inappropriate development and encourages the provision of biodiversity improvements from all developments, including green roofs and walls where feasible.

In support of the application, a UGF Plan (Drawing No. 0303-BDL-XX-XX-DR-L-0805-P02) has been submitted, which outlines that the proposal is expected to achieve a UGF score of 0.39, which exceeds the target score of 0.3 and will be secured by condition.

Additionally, the Ecological Appraisal has been reviewed by the Council's Ecology Officer, who has no objections to the assessment of the site and recommends that the proposed biodiversity enhancements are secured by way of condition.

In this respect, the application site is considered to have broadly low ecological value due to the absence of notable areas of habitat, other than habitats found widely in the surrounding landscape, such as ornamental planting and hardstanding. Moreover, opportunities for biodiversity enhancements include the installation of bat and bird boxes, bug houses, and tree and shrub planting, alongside the creation of a biodiverse green roof

7.15 Sustainable waste management

Policy SI 7 (Reducing waste and supporting the circular economy) and Policy D6 (Housing quality and standards) of the London Plan require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

Policy EM11 of the Hillingdon Local Plan: Strategic Policies (Sustainable Waste Management) states that the council will aim to reduce the amount of waste produced in the borough. To achieve this, the council will require all new developments to address waste management at all stages of a development's life from design and construction through to the end use and activity on site.

In support of the application, a Delivery and Servicing Plan (September 2022) has been submitted, which includes a Waste Strategy. Waste collection will be managed by a private contractor, and the hotel and light industrial loading bays would be used by refuse collection vehicles. Suitable refuse storage bins will be provided for general waste, organic waste and recyclable material, and would be secure and separated from members of the public.

7.16 Renewable energy / Sustainability

Policy SI 2 of the London Plan (Minimising greenhouse gas emissions) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy, placing an additional requirement to monitor emissions beyond implementation to determine the effectiveness of the mitigation. Policy SI 2 also sets targets for carbon dioxide emission reductions in buildings. These are expressed as minimum improvements over the Target Emission Rate (TER) outlined in national building regulations. The current target for residential and non-residential buildings is zero carbon beyond the current Building Regulations Part L 2013.

Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy and how a minimum on-site reduction of at least 35% beyond Building Regulations will be achieved. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either through a cash in lieu contribution to the borough's carbon offset fund or off-site, provided that an alternative proposal is identified and delivery is certain.

Moreover, major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations (i.e. unregulated emissions).

The Energy and Sustainability Statement (September 2022) has been reviewed by the Council's Energy Officer, and it is considered that whilst the statement is at a strategic and theoretical stage, it appears to be broadly sufficient. However, a concern is the lack of attention to the existing building which will have a new facade and refurbishment at ground and roof level, and the Council would expect the applicant to demonstrate a greater degree of improvements to the existing building, and this would be secured by way of condition and through a legal agreement.

7.17 Flooding or Drainage Issues

Policy SI 12 of the London Plan (Flood risk management) sets out that flood risk across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities and developers where relevant. Proposals should further ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading.

In addition, Policy SI 13 of the London Plan (Sustainable drainage) sets out that proposal should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

In support of the application, a Flood Risk Assessment and Surface Water Management Strategy has been submitted, which has been reviewed by the council's lead Flood Risk Officer. Their comments indicate that whilst generally acceptable, some additional details are required, including demonstrating that Thames Water consent has been gained (who have been consulted and are not objecting), whilst also confirming the maintenance owner, and confirming the runoff rate for the 1 in 1 year event. These further details, and overall compliance with Policy SI 12 and SI 13 of the London Plan, can be secured by way of condition.

7.18 Noise or Air Quality Issues

Policy D14 of the London Plan (Noise) states that new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Additionally, Policy D13 of the London Plan (Agent of Change) sets out that proposals should mitigate and minimise 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 existing noise-generating uses, improving and enhancing the acoustic environment and promoting appropriate soundscapes.

The Council's Noise Officer has reviewed the scheme and sets out, on the basis that the proposal is for a hotel (i.e. not a residential use) and therefore future occupiers would be transient in nature, that the proposal is acceptable.

The proposal would be air quality neutral, and a contribution is required to make the scheme air quality positive in accordance with Policy SI 1 of the London Plan (Improving air quality) and Policy EM8 of the Hillingdon Local Plan: Part 2 (Land, Water, Air and Noise). This would be secured as a planning obligation, to be used to fund measures to improve local air quality.

7.19 Comments on Public Consultations

Letters dated 07-10-22 were sent to 117 nearby properties, a site notice was displayed outside the site on 07-11-22, and a press notice was displayed in a local newspaper on 03-

11-22.

No responses have been received from local residents.

Three responses were received from local business/charities in support of the proposal.

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (Planning Obligations and Community Infrastructure Levy) sets out that planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it, to ensure that development is sustainable in accordance with the NPPF (2021). Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL) and through planning obligations.

Specifically, planning obligations are used to secure the provision of affordable housing in relation to residential development schemes, and where a development has infrastructure needs that are not addressed through CIL to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal. Applications which fail to include appropriate planning obligations to make the proposal acceptable will be refused. Planning obligations run with the land, are legally binding and enforceable.

The Community Infrastructure Levy Regulations, the NPPF and Planning Practice Guidance have put three tests on the use of planning obligations into law. In this regard, planning obligations must meet the following tests to be lawful:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonable related in scale and kind to the development.

The following Heads of Terms are proposed, to be secured through a section 106 agreement to either ensure policy compliance or to address deficiencies in the scheme which could not be addressed through amendments to the plans:

- Details shall be submitted for a Construction and Employment Training scheme in accordance with the Council Planning Obligations SPD with the preference being for an in-kind, on-site scheme to be delivered;
- A full Travel Plan, including a Low Emission Strategy, is to be submitted and approved in writing by the Local Planning Authority. The Plan will include targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan, and a commitment to delivering the Travel Plan objectives. A £20,000 Travel Plan bond is also to be secured;
- To secure compliance with the submitted Hotel Management Strategy, to manage the ongoing operation of the hotel and demonstrate that the proposal operates within the C1 use class;
- Hospitality Training, to provide apprenticeships and on-the-job training for young people interested in pursuing a career in the hospitality industry;
- Secure compliance with the Community Investment Programme;
- Enter into a s278 agreement for works to the Highway, including the dropping and raising of kerbs (as required) and other such works as may be required to the highway to implement the development;
- £268,698 as a financial contribution to be used by the Council to fund measures to reduce poor air quality within the borough;

- £160,000 as a financial contribution to be used towards Active Travel Zone improvements to the local area, specifically to address walking and cycling deficiencies on the northern side of Uxbridge Road;
- A carbon offsetting sum based on an Updated Energy Strategy to be submitted to discharge Condition 4, with the offset calculation based on £95 per tonne of CO2 over a 30 year period;
- £10,000 as a financial contribution to be used towards consulting and implementing an extension to the nearby parking management scheme to include the surrounding area and Springfield Road; and
- A Project Monitoring and Management Fee, equalling 5% of the total financial contributions paid under this agreement.

All financial contributions payable under the s106 agreement shall be paid prior to commencement.

7.21 Expediency of enforcement action

N/A.

7.22 Other Issues

CONTAMINATION

Policy EM8 of the Hillingdon Local Plan: Part 1 (Land, Water, Air and Noise) states that the council expects proposals for development on contaminated land to provide mitigation strategies that will reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill. This should be read alongside Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (Development of Land Affected by Contamination), which requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Policy DMEI 12 further states that where necessary, conditions will be imposed on planning permissions for development affected by contamination to ensure all the necessary remedial works are implemented.

In support of the application, a Land Contamination Desk Study and Preliminary Risk Assessment Report has been submitted, which has been reviewed by the Council's Land Contamination Officer.

The desk study report provides the required details to be confident of granting approval, including an initial Conceptual Site Model and Preliminary Risk Assessment. The report further identifies various potential pollutant linkages which may be present at the site, and as such, in accordance with Policies EM8 and DMEI 12 of the Hillingdon Local Plan, a site investigation is recommended, and the works should be implemented in accordance with the details within the report. This would be secured by way of condition.

FIRE SAFETY

In the interests of fire safety and to ensure the safety of all building users, Policy D12 of the London Plan states that all proposals must achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outside spaces for fire appliances to be positioned on, provide suitable access and equipment for firefighting which is appropriate for the size and use of the development, and provides spaces which are appropriate for use as an evacuation assembly point.

Buildings should be designed to incorporate appropriate features which reduce the risk to

life and the risk of serious injury in the event of a fire by being constructed in an appropriate way to minimise the risk of fire spread. This should include appropriate fire alarm systems, passive and active fire safety measures, suitable and convenient means of escape and an associated robust evacuation strategy which can be periodically updated and published, and which all occupants can have confidence in. These measures should be set out in a Fire Strategy, prepared by a suitably qualified fire engineer.

In support of the application, a Fire Statement has been submitted, which outlines the basics of fire safety measures, with the knowledge that further details would be secured at detailed design stage. The submission of these additional details would be secured by condition.

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

The proposal is considered to be acceptable in principle, making efficient use of a brownfield site to introduce industrial uses into a SIL whilst enhancing an existing hotel use. Moreover, the scale and design of the scheme are considered to be broadly acceptable, and the proposal would not have a significant impact on the amenity of any nearby residential properties.

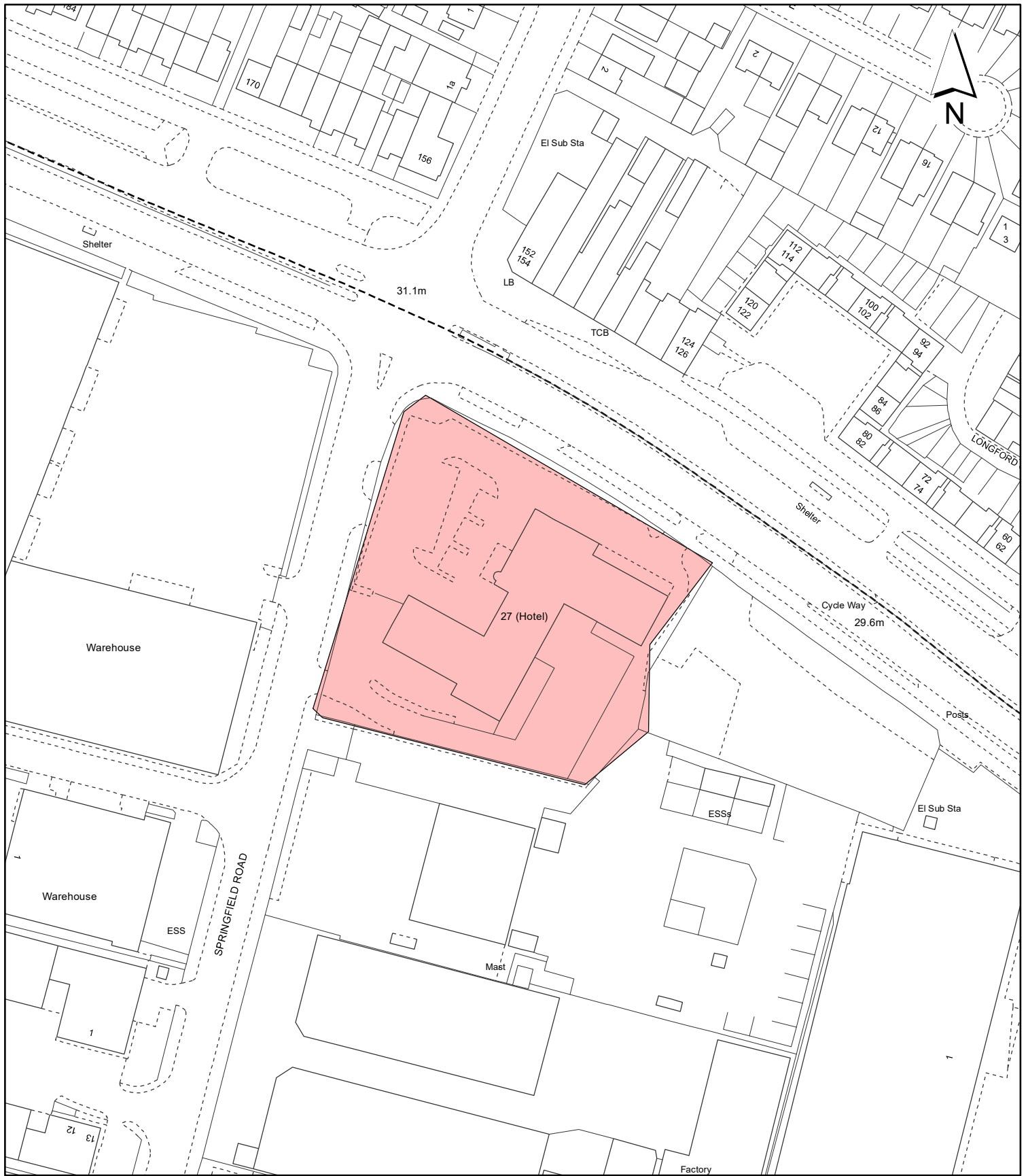
Overall, the proposal, on balance, is recommended for approval, subject to the conditions and obligations set out in this report.

11. Reference Documents

London Plan (2021)
Hillingdon Local Plan: Strategic Policies (2012)
Hillingdon Local Plan: Development Management Policies (2020)
National Planning Policy Framework (NPPF) (2021)

Contact Officer: Andrew Thornley

Telephone No: 01895 250230



Notes:

 Site boundary

For identification purposes only.
 This copy has been made by or with the authority of the Head of Committee Services pursuant to section 47 of the Copyright, Designs and Patents Act 1988 (the Act).
 Unless the Act provides a relevant exception to copyright.
 © Crown copyright and database rights 2020 Ordnance Survey 100019283

Site Address:

Hyatt Place

LONDON BOROUGH OF HILLINGDON
Residents Services
Planning Section

Civic Centre, Uxbridge, Middx. UB8 1UW
 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:

2385/APP/2022/2952

Scale:

1:1,250

Planning Committee:

Major

Date:

April 2023



HILLINGDON
 LONDON