

10 February 2010

Heathrow West Hotel, Longford

in the London Borough of Hillingdon

Planning application no.65419/APP/2009/2715

Strategic planning application stage 1 referral (new powers)

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

The proposal

Erection of a part 3/4/5/6-storey 498-bedroom hotel with ancillary meeting rooms, bar and restaurant facilities, 179 parking spaces at grade and basement levels, creation of a new access from the A4 Colnbrook By-Pass, cycle parking and landscaping; erection of 6 two storey three-bedroom houses with associated amenity space and car parking; and use of No.470 Bath Road for hotel related/residential purposes (including demolition of Nos.452 and 460-468 (even) Bath Road.)

The applicant

The applicant is **Rokeby Developments (Southern) Ltd**, and the architect is **tp Bennett**.

Strategic issues

Hotel use on the site at close proximity to Heathrow Airport is acceptable. **Very special circumstances** justify the inappropriate development on portion of the site designated as **Green Belt**. The **urban design** complies with the London Plan but the recommended measure should be delivered. Concerns in regard to **inclusive design** should be addressed. Further information is required on **climate change mitigation and adaptation**. There are concerns on issues related to **transport and parking** which should be addressed. The strategy for **employment** and **training** should be submitted.

Recommendation

That Hillingdon Council be advised that while the application is generally acceptable in strategic planning terms, for the reasons set out in paragraph 97 of this report; but that the possible remedies set out in paragraph 99 of this report could address these deficiencies.

Context

1 On 30 December 2009 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 10 February 2010 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for

taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1B.1 (c), of the Schedule of the Order 2008: "*Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings outside Central London and with a total floorspace of more than 15,000 square metres.*"

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

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site comprises an area of approximately 2ha. The site is bounded by Bath Road to the south, the westbound carriageway of the A4 Colnbrook Bypass to the north; the Duke of Northumberland's River to the west and the Abbey Business Centre to the east. The site is located to the north-west of Heathrow Airport, within close proximity to Terminal 5 (see Figure 1).



Figure

1: Aerial View of the application site (Source: applicant's design and access statement)

6 The site comprises land currently used by the Abbey Business Centre for car parking, seven residential dwellings nos. 452, 456, 460 – 470 Bath Road, all of which are owned by the applicant, and private open space part of which is currently designated as green belt. The Abbey Business Centre, a three storey office block, is situated immediately to the east of the site, and is accessed from Bath Road.



Figure 2: The existing built environment including the residential dwellings and the listed building at the southern boundary of the site. (Source: applicant's design & access statement)

7 The buildings within the site (as shown in Figure 2) are generally of low architectural merit apart from 456 Bath Road ‘The Stables’ a vacant, two storey dwelling house, which is Grade II Listed and 470 Bath Road, a building of local historic interest. Both buildings will be retained and protected as part of this proposal. Longford Village Conservation Area is located approximately 200 metres to the west of the site.

8 To the north, the A4 Colnbrook Bypass is characterised by predominantly commercial, institutional and hotel uses. However, a small cluster of semi detached, two storey, post-war dwellings are located immediately to the north of the site. The British Airways Headquarters, BT Offices, Immigration Removal Centre and the Sheraton Hotel comprise some of the commercial and institutional uses located along the Colnbrook Bypass to the north-east and north-west of the site. The buildings fronting the A4 vary in height between 2 and 7 storeys.

9 The nearest stretch of Transport for London Road Network to the site is the A4 Colnbrook Bypass, which bounds the northern edge of the site and is proposed to form the site access. The nearest stretch of Strategic Road Network is over 3 kilometres away.

10 The site is served by 2 bus routes accessible from Bath Road adjacent to the Heathrow Thistle Hotel, to the south of the site. A further 2 bus stops, Colnbrook Bypass (westbound) and Duke’s Bridge (eastbound) are on the A4 Colnbrook Bypass. These 4 bus stops are within a 400m walking distance of the site. The closest London Underground and National Rail services are accessed from Heathrow Terminal 5 via bus route 423. Piccadilly Line and Heathrow Express services are accessible from the Terminal. Correspondingly, the site has a public transport accessibility level of 1b on a scale of 1 to 6, where 1 is lowest and 6 is the highest.

11 The site is also currently served by 2 Heathrow Hoppa bus routes via the Thistle Hotel which offer links between Bath Road and Heathrow Terminal 1, 2, 3 (H4) and Heathrow Terminal 5 (H51). Although, as these are non-TfL services they are not included within the public transport accessibility level assessment.

Details of the proposal

12 This proposal seeks a full planning permission for the redevelopment of land including 460 – 468 Bath Road and land to rear to provide a 498 bed hotel including ancillary uses such as meeting rooms, a bar and restaurant, 179 car parking spaces provided at grade and within a basement, creation of a new access from the A4, cycle parking and landscaping.

13 The plot comprising 452 Bath Road will be redeveloped to provide 6 no. 3 bed dwelling houses and 9 parking spaces, which will off-set the demolition of 460 – 468 Bath Road. As shown in Figure 3, 456 Bath Road ‘The Stables’ (Grade II Listed), and 470 Bath Road (building of local historic interest) will be retained for hotel related/residential purposes. A new access is proposed from Bath Road as the existing access serving 452 Bath Road could not be utilised. The access road will lead to a parking court comprising the 9 parking spaces.



Figure 3: Bath Road - South elevation of the proposed scheme (Source: applicant's design & access statement)

Case history

14 In January 1997 an application seeking the renewal of (the outline consent that was granted in August 1991, for the erection of four commercial buildings comprising 5,010sq.m for use as offices together with 6no. flats. This consent though not implemented was granted; however, the proposal sought the erection of a single, three storey building of 5,010sq.m for of B1 space with car parking facilities. The application was implemented and it now referred to as the Abbey Business Centre (ABC).

15 On 29 October 2009 a follow up pre-planning application meeting was held at City Hall following a pre-planning application meeting that was held on 11 May 2009. The scheme was broadly supported and the applicant was advised to investigate thoroughly the issue of public access, visual and physical link through the site both from Bath Road and Colnbrook Bypass, in particular the provision of pedestrian crossings over both roads, linking the Green Belt sites to the north and south.

Strategic planning issues and relevant policies and guidance

16 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------|--|
| • Hotel use/tourism | <i>London Plan; Good Practice Guide on Planning for Tourism (DCLG)</i> |
| • Green Belt | <i>London Plan; PPG2</i> |
| • Urban design | <i>London Plan; PPS1</i> |
| • Inclusive design | <i>London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)</i> |
| • Climate change | <i>London Plan; PPS1, PPS Planning and Climate Change Supplement to PPS1; PPS3; PPG13; PPS22; Energy Strategy; Sustainable Design and Construction SPG</i> |
| • Ambient noise | <i>London Plan; the Mayor's Ambient Noise Strategy; PPG24</i> |
| • Air quality | <i>London Plan; the Mayor's Air Quality Strategy; The Control of dust and emissions from construction and demolition BPG; PPS23</i> |
| • Flooding | <i>London Plan; Mayor's draft Water Strategy; PPS25, RPG3B</i> |
| • Employment | <i>London Plan</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy; PPG13</i> |

17 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 1998 Hillingdon Unitary Development Plan and the London Plan (Consolidated with Alterations since 2004).

18 The following are also relevant material considerations:

- The draft replacement London Plan, published in October 2009 for consultation.
- The Revised Core Strategy (Preferred Options) 2007 and the South Hillingdon Area Action Plan

Hotel use/tourism

19 The proposed hotel development comprises approximately 31,209 sq.m of gross external floorspace. The hotel building varies in height from two/three storeys at the southern end of the

site, in response to the scale and character of development along Bath Road, and five/six storeys in response to the more commercial scale and character of A4 Colnbrook Bypass.

20 Policy 3D.7 of the London Plan seeks to improve the quality, variety and distribution of visitor accommodation. Outside the Central Activities Zone new visitor facilities should be located in town centres and other locations such as opportunity areas and areas with good public transport access to central London and international and national transport termini. The site is not located in a town centre but it is within the indicative boundary for the wider hinterland of the Heathrow north and south opportunity area. Additionally, the Heathrow area is recognised in the west London Sub Regional Development Framework as being a likely location for future hotel provision (Annex 4, table 1b.3), driven by the expansion of Heathrow Airport.

21 Although the site is outside a town centre, it does fall within the indicative wider hinterland of Heathrow North and South Opportunity Areas. These Opportunity Areas include some of the strategically important clusters of hotels and related development around Heathrow, which need to be enhanced and extended. The Mayor's Tourism Vision seeks to ensure that London expands as a global tourism destination; develops a broader visitor base; and spreads the benefits of tourism throughout the capital. To accommodate potential growth, a further 40,000 net hotel bedrooms should be provided in the period up to 2026 in a range of suitable locations throughout London.

22 PPS6 directs town centre uses such as hotels towards existing centres. Although the site does not fall within a town centre, Heathrow and the wider hinterland (as defined by the SRDF) is considered a specialised centre for airport related uses including hotels. Given the proximity of the site to Heathrow airport, the principle of a hotel use at this location is considered to be in accordance with PPS6.

23 The Mayor has been referred a number of applications for Hotels on and around Bath Road and he is aware that others are also proposed and in the pipeline of the planning process, including some that may not be referable. The Mayor would welcome the opportunity to work with the Council to develop a strategy to address amongst other matters, a coordinated design response, public realm enhancements of Bath Road and the surrounding area and major transport improvements. This could be delivered through the production of a joint Opportunity Area Planning Framework.

24 The site has a public transport accessibility level of 1b (which is poor) and has limited public transport links with central London. The applicant has stated that the proposed hotel will cater for international tourists from Heathrow, many of whom will not require access to central London. However, the hotel staff and the conference require significant parking provision and this issue is assessed further in the transport section of the report. In accordance with supporting text to the policy set out in the London Plan, the hotel operator should give consideration to providing staff accommodation and providing training for staff.

25 As a result, the proposed development complies with policy 3D.7 of the London Plan.

Green Belt

26 The north-west corner of the application site is designated as Green Belt. Policy 3D.9 of the London Plan clearly indicates that Green Belt is to be protected from inappropriate development, and such inappropriate development should not be approved except in very special circumstances. The London Plan also makes clear that London's growth should be sustainable and not encroach on London's own precious green spaces (paragraph xi). The reference to "inappropriate development" flows directly from PPG2, which sets out the Government's policy towards Green Belt.

27 PPG2 identifies the purposes of Green Belt, which are: to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns from merging; to assist in safeguarding the countryside from encroachment; and to assist in urban regeneration by encouraging the recycling of derelict land. Government guidance states that development is inappropriate unless it is for the following purposes:

- Agriculture and forestry
- Essential facilities for outdoor sport and recreation; for cemeteries; and for other uses of land, which preserve the openness of the Green Belt
- Limited extension, alteration or replacement of existing dwellings
- Limited infilling or redevelopment of major existing developed sites identified in adopted development plans, which meet the criteria in Annex C of PPG2

28 The proposed use is inappropriate as defined by PPG2, the London Plan and Hillingdon UDP policies (though the emerging Core Strategy and Proposals Map propose the deletion of this site from the Green Belt). That said the only possible justification to allow this proposal would be if very special circumstances could be demonstrated. There is no definition of 'very special circumstances' and each planning application has to be judged on its own merits.

29 The applicant has provided very special circumstances. These include the following:

- The north west corner of the site no longer performs a meaningful Green Belt function, as defined by PPG2. The Green Belt is not currently accessible to the public and its quality is very poor. It is not maintained and currently has a cars and rubbish dumped across the site.
- Hillingdon's emerging Core Strategy and Proposals Map proposes the deletion of this site from the Green Belt.
- The proposed riverside corridor will significantly improve the amenity value and biodiversity of this space through a high quality, but natural, landscaping scheme. Public access into the corridor will be provided from the A4 Colnbrook Bypass and Bath Road.
- The building will not give rise to a significant impact on views from within the Green Belt.

30 Green Belt is not a land use in itself, but a planning tool designed to limit urban sprawl. Agriculture is still a major land use in the borough and many areas have the appearance of visually attractive green countryside, which also provides many opportunities for informal recreation. However, in this specific area as the applicant has stated there is no visible function or use of purpose of the Green Belt. Although the present derelict state of the site cannot be considered as a very special circumstance, albeit, the proposed riverside corridor and the landscape strategy will enhance the amenity value and biodiversity of the site. It will also serve as a pedestrian link between existing Green Belt spaces to the north and south.

31 The emerging Revised Core Strategy and Proposals Map (2007) of Hillingdon, which is currently at a preferred option stage, is a material consideration. In specific response to requests from land owners and interested parties the Council undertook to assess existing and potential Green Belt and Major Developed Sites in the Green Belt when preparing the Core Strategy. The changes arising as a result of a detailed assessment proposes the deletion of this site from the Green Belt. Whilst this is noted, the Core Strategy preferred option would only have limited weight at this stage.

32 On balance, the very special circumstances provided justify the inappropriate development on the site (only a portion of it) designated as Green Belt. That said the Council should ensure that the Proposals Map when adopted should clearly indicate the deletion of this site from the Green Belt and that proper conditions are imposed in order that the proposed riverside corridor, the landscape strategy and opening up this part of the land to the public and its connection to Green Belt sites to the north and south are delivered and secured through condition or s106 agreement.

Urban design

33 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London, and policy 4B.2 seek to promote world-class, high quality design and design-led change in key locations. In addition to Chapter 4B, London Plan policies relating to sustainable design and construction (4A.3) and the Blue Ribbon Network (4C.11) are also relevant.

34 The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1).

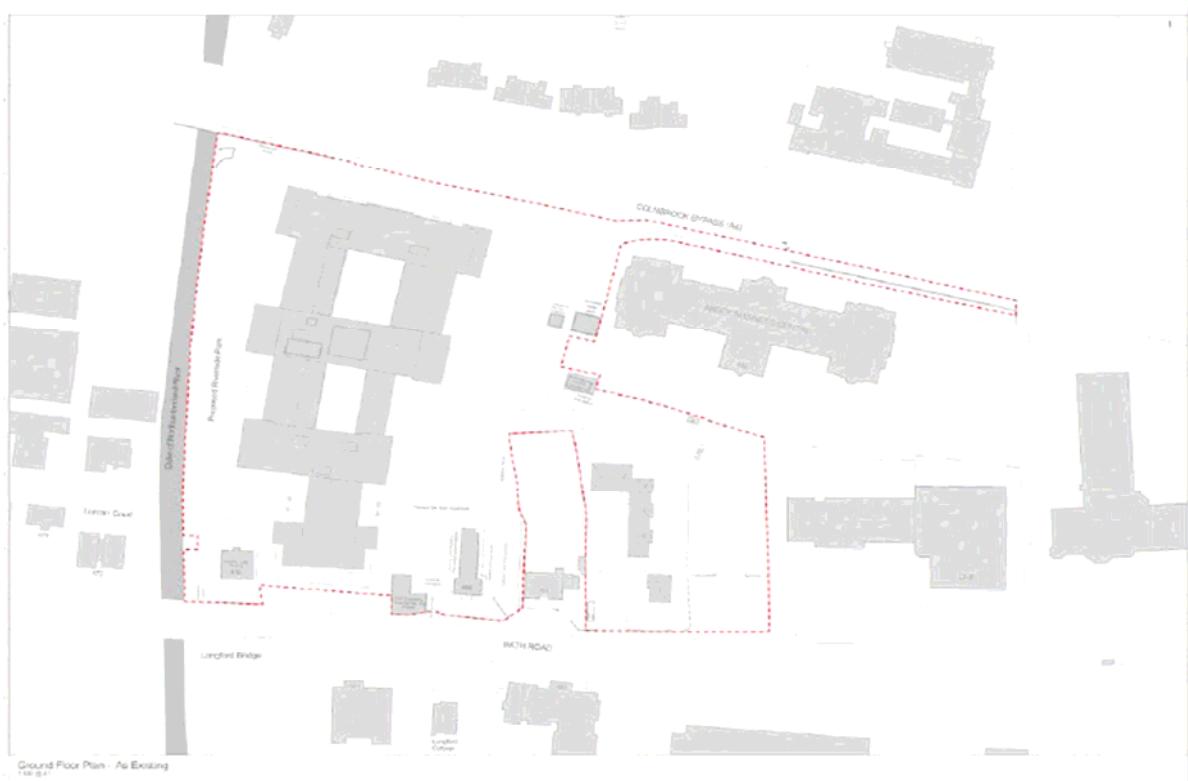


Figure 4: Block Plans and layout of the proposed hotel development (Source: applicant's design & access statement)

35 The proposed design reflects some of the pre-application advice provided to the applicant although there remain areas for improvement and further clarification. The proposed layout as shown in Figure 4, and the distribution of scale and massing broadly responds to the varied context of site. Most importantly the scale of development fronting Bath Road reflects the character of that route and the domestic scale of the Grade II listed 456 Bath Road. The Council should consider the acceptability of the detail of the proposals relating to this listed building though review of the relevant application and also the impact on the setting of the locally listed building in the vicinity.



Figure 5: North East view of the proposed hotel as seen from the A4 Colnbrook Bypass (Source: applicant's planning statement)

36 The architecture of both the hotel (Figure 5) and the residential elements (Figure 6) would be suitably contemporary in appearance but with a palette of materials incorporating brick and timber derived from the locality. This would achieve a suitable degree of contextual harmony whilst avoid a pastiche of local architectural character that would not translate to a building of this type.



Figure 6: North-South Elevations of the residential element of the scheme (Source: applicant's planning statement).

37 The broad approach to vehicular and pedestrian access and egress is logical and the landscape design suitably communicates the routes and entrances. The landscaping also mediates the relationship with listed building and the retention of the orchard is particularly positive in this regard.

38 The principal concern with the proposal relates to the design of the 'linear park' to the west of the hotel building, adjacent to the Duke of Northumberland River. The proposed creation of this open space in response to the river corridor and associated open spaces to the north, south and west of the site is welcome and supported by the relevant London Plan Blue Ribbon and design policies. (See Figure 7).



Figure 7: North-south link of the river corridor scheme (Source: applicant's planning statement)

39 The application material is, however, ambiguous on the intended access and function of this space. The biodiversity function of the space is clear from the submitted landscape strategy and supported. The potential role that the space would have in providing foot and/or cycle path link along the river corridor between the Colnbrook Bypass (A4) and Bath Road, the provision of new associated crossings of these routes and the links and role this would have in the wider pedestrian and cycle route network is unclear, being shown on concept sketches but not on the indicative landscape plans. This should be clarified and the applicant should commit through appropriate conditions and/or legal agreement to the provision of the path and necessary crossings. The applicant should note that such enhancements are strongly supported by the London Plan and are one of the key considerations in respect of Green Belt issues discussed in paragraph 30 to 32. The applicant should also provide pedestrian crossing facilities over the roads to the north and south of the site.

40 In connection with this the applicant should review the design of the western part of the hotel building. The applicant was advised at pre-application stage to arrange the layout of the building, and particularly the hotel's communal functions such as bars and restaurant, to provide activity and surveillance onto the riverside space. This has not taken place and the current design of the northern part of the hotel complex turns its back on the riverside space at ground levels. The southern part of the building is more successful having bed and function rooms overlooking the space. The position of the car park access ramp along the western edge of the building is also not conducive to a positive relationship between the building and this space. There is scope given the range and size of the communal functions at ground level to provide sufficient animation and passive surveillance to both the western and eastern frontages of the building. The design should be revised to address the concerns.

41 The plans demonstrate that the design of the five houses in the southeast part of the site would be consistent with existing policy and the emerging residential design standards in the draft replacement London Plan and the Mayor's Housing design guide.

42 In summary the proposals are positive in many regards but the applicant should address the comments above to ensure consistency with the design policies of the London Plan.

Inclusive design

43 The aim of London Plan Policy 4B.5 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), and this and all developments should seek to better minimum access standards. Policies 7.2 and 3.8 of the draft replacement London Plan (2009) reinforce the principles of inclusive access.

44 Policy 3D.7 of the London Plan relates to the provision of visitor accommodation and facilities and it supports an increase in the quality and quantity of fully wheelchair accessible accommodation. A recent hotel demand study by the GLA (June 2006) looked at the supply of wheelchair accessible hotel accommodation in London and identified a scarcity of such accommodation. The study also noted that the dearth of information on accessible rooms and other hotel facilities is impacting on the number of visits by disabled people to London, and that the 2012 Olympic and Paralympic Games will require a much greater stock of accessible accommodation. The Hotel Demand Study showed that very few hotels were using Visit Britain's 'National Accessible Accommodation Standards' to assess accessibility, and that few provided information to disabled people on how accessible their hotel is.

45 As part of the London Development Agency's Economic Development Strategy, the Tourism Action Plan endorses a vision for a London that is more accessible for everyone. The London Development Agency is now working with the hotel industry to promote compliance with Visit Britain's National Accessible Accommodation Standards by undertaking access audits of existing hotels and publishing detailed information on a hotel's accessibility. It would be helpful to understand how this advice along with the new Publicly Available Specification 88 (the guidance on accessibility for large hotel premises and hotel chains) will be addressed in this proposal.

46 The applicants have submitted a detailed design and access statement to accompany the application, however it is not clearly demonstrated how the design thinking behind the application addressing the specific access needs of disabled people. Although the scheme is generally accessible there are some detailed design considerations that should be considered in terms of the provision of at least 10% of wheelchair accessible bedrooms, step free accesses, size, number and distance of lifts from the core of the hotel, etc., which could improve the facilities provided for disabled people.

47 In regard to the residential units, the design and access statement states that the floor areas of the residential units meet or exceed the sizes set out in the Housing Quality Indicators and that the plans indicate a typical 3 bed (88sqm and 90sqm NIA) units, and that accessible units will be designed to comply with the Wheelchair Housing Design Guide (Habinteg Housing Association 2006). This is welcomed and supported. However, the design and access statement should demonstrate that inclusiveness at a higher standard is incorporated into the scheme and should ensure that the principle of Lifetime Homes and wheelchair accessible homes are enshrined in the scheme.

Climate change mitigation and adaptation

48 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which applicants must address mitigation of and adaptation to the effects of climate change.

49 Policies 4A.2 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve this. Chapter 5 of the draft replacement London Plan sets out the approach to climate change and requires developments to make the fullest contribution to minimising carbon dioxide emissions.

Overview of the proposals

50 The applicant has broadly followed the energy hierarchy in Policy 4A.1. Sufficient information has been provided to understand the proposals as a whole and to verify carbon dioxide savings in principle

BE LEAN

Baseline carbon dioxide emissions (policy 4A.4 of London Plan)

51 Baseline emissions have been calculated using a suitable modelling tool and estimated to be 1,373 tonnes for a building regulations 2006 part L compliant development. The applicant should update the baseline emissions in order that non-regulated energy use also be included.

Energy efficiency standards (policy 4A.3 of the London Plan)

52 Energy efficiency and conservation measures are applied beyond that normally incorporated into a 2006 Building Regulations compliant design. This incorporates measures such as passive designs including incorporating high thermal insulation, thermal mass, improved u-values, air tightness, passive solar gain, intelligent/energy efficient lighting etc. The applicant has estimated that this would result in a carbon emission reduction of 17.4% compared to the baseline (not including non-regulated energy).

BE CLEAN

District heating (policies 4A.5 and 4A.6 of the London Plan)

53 It is acknowledged that the 6 houses would not be feasible to connect.

54 The energy team is not aware of any existing district heating networks in the vicinity of this development. The applicant should investigate the potential for connecting the scheme to existing or planned heating networks and also investigate opportunities of linking the development to planned, new or existing developments in the vicinity.

55 The infrastructure proposed to deploy heating and cooling is unclear. The applicant should explain by what means the heating and cooling would be deployed throughout. It is envisaged that communal systems compatible with potential future district heating connection would be implemented, e.g. 4 pipe fan coil system with heating fed from a single energy centre – the applicant need to comment on this.

Combined Heat and Power (policy 4A.6 of the London Plan)

56 A 410kW electrical output capacity natural gas fired combined cooling heat and power system has been proposed which could reduce carbon dioxide emissions by up to 49% including the reduction from the absorption chiller system for cooling. This approach is welcomed and supported.

Cooling (policy 4A.6 of the London Plan)

57 Combined heat and power engine has been matched to provide cooling via absorption chillers which could reduce carbon dioxide emissions by up to 1.7%. The applicant should however submit a more detailed cooling strategy, which addresses the potential risk of overheating and sets out measures to minimise the need for active cooling systems.

BE GREEN

Renewable energy technologies (policy 4A.7 of the London Plan)

58 The applicant has identified a maximum roof space of 300sq.m. for photovoltaic array. This is estimated to reduce baseline carbon emissions by 2.5%. This is supported.

Overall acceptability

59 The proposals are acceptable in principle but further information and revisions are required.

Recommended conditions / section 106 clauses

First condition

60 Definitions: "452 Bath Road Hotel": The 498-bedroom hotel including ancillary restaurant and café facility located on 452 Bath Road, Hillingdon.

61 "452 Bath Road Hotel heat distribution network": The heat distribution network supplying at least all of the domestic heat water and pre-heating requirements of the hotel ventilation air.

62 "452 Bath Road Hotel District Energy Centre": The energy centre supplying the 452 Bath Road Hotel heat distribution network .

Clauses

63 Clause 1: Upon the completion of 452 Bath Road Hotel development the 452 Bath Road Hotel heat distribution network shall be installed and operational and shall thereafter serve all the 452 Bath Road Hotel using the 452 Bath Road Hotel heat distribution network

64 Clause 2: Upon the occupation of 452 Bath Road Hotel scheme, the 452 Bath Road Hotel Energy Centre should be supplied with heat from either:

- Combined heat and power plus additional top-up heat generating plant, or
- An external low carbon district heating network, or
- A combination of the above.

Second condition

65 Upon the completion of development no less than 300sq.m. of roof mounted solar photovoltaic panels with a southern component and absent of significant shading throughout the year should be mounted on the roof of the development.

Noise

66 A noise assessment has been undertaken, the results of which have been assessed within the Noise Chapter of the Environmental Statement. The noise assessment has concluded that during the development's construction period, the effect of noise and vibration on the surrounding area will be negligible and various measures such as site hoardings would be implemented to mitigate against any impacts that may arise.

67 The noise assessment has also concluded the operational impact of the hotel development on the surrounding area (i.e. plant and vehicular movements) will be minimal and can be mitigated through the implementation of appropriate planning conditions.

68 As the proposed residential dwellings fall within a PPG24 Category C area, the noise assessment also includes confirmation that an appropriate level of insulation can be achieved to ensure compliance with the internal noise environment required under PPG24.

69 In conclusion, the noise impacts generated by the development are considered to be negligible.

Air Quality

70 The impact of the development during construction and operation on air quality can be sufficiently mitigated and is therefore in accordance with the relevant policies of the development.

71 An air quality assessment has been carried out with specific reference to the location of the development site within the designated Air Quality Management Area (AQMA), (for exceedances of the pollutant nitrogen dioxide). The Environmental Statement comprises a chapter containing an assessment of the development's impact on air quality. The Statement confirms the development will contribute to Nitrous Oxide concentrations at the selected receptor points, but this small increase is not likely to cause any further breach of the statutory objective level for this location. Through various measures implemented during the construction and operational phases of the development (i.e. a Construction and Environmental Management Plan and Green Travel Plan) the effects of the development on air quality can be effectively mitigated.

72 The air quality information provided complies with the London Plan policy 4A.19 'Improving Air Quality'.

Flooding

73 The site lies within the Environment Agency defined Flood Zones 1 and 2 and the proposed land use is classified as 'more vulnerable'. However, the supporting documents submitted do not show a flood risk assessment.

74 The applicant is required to carry out a flood risk assessment and proposed measures that would mitigate the flooding impact and how surface Water Run-off is treated - that is what measures would be proposed to provide underground rainwater storage. The Council should ensure that these are secured through conditions.

Employment and training

75 In accordance with the London Plan and the Economic Development Strategy, the GLA seeks to develop London as a top international destination and principal UK gateway for visitors, tourism and investment.

76 The GLA supports the provision of additional hotel accommodation that will add to London's offer to visitors as well as enhance London as a tourist destination. The proposed hotel

development supports London Plan policy 3D.7 'Visitors Accommodation and Facilities' in that capacity for new hotel accommodation has been identified.

77 Continued investment in the skills of London's current workforce will ensure that skills and training provision is tailored to meet current employer demand. The GLA is committed to develop the skills that London needs to sustain economic growth, improving individual's employability skills in order to create a positive impact on the skills levels within all of London's communities. Consequently, and in accordance with London Plan policies 3B.1 'Developing London's Economy' and 3B.11 'Improving Employment Opportunities for Londoners' the GLA is pleased to learn that the applicant has agreed to provide construction and hospitality training as part of the s106 agreement. The Council should ensure that processes are put in place to ensure that local unemployed people are targeted by advertising appropriately (local Job Centre, leaflet drop, local newspaper etc). The applicant should consider initiatives to allow for the recruitment of apprentices from local schools, as well as encouraging the recruitment of new employees from school leavers, older people and those that have been out of work for the long-term.

78 The Council should ensure that it is kept up-to-date on the progress of the site both during the construction phase and completion, so as to be able to offer appropriate training to enable local people to compete both for jobs and work created in the construction process and within the completed development.

Transport for London's comments

79 On 28th January 2009 a pre-planning application meeting was held with TfL officers regarding the redevelopment proposals. Since the pre-application meeting in February 2009, the London Plan: consultation draft replacement has been published and is now a material consideration. This should be referenced within the Transport Assessment.

80 The first principle approach of using surveys from similar sites is welcome and the Marriott Hotel is an acceptable site.

81 TfL agrees in principle with the proposed access from the A4 subject to detail design as part of the s278 agreement that will be between TfL and the developer. The new access will require suitable pedestrian facilities such as tactile paving. TfL welcomes the inclusion of a Stage 1 safety audit and is in agreement that all the points raised can be mitigated through the detailed design process.

82 179 car parking spaces are proposed for the hotel development (17 at surface level and 162 in the basement). Of these 18 will be allocated for disabled users. This is acceptable. Nine car parking spaces are proposed for the six residential units, giving a ratio of 1.5 while this lies within the maximum London Plan standards and TfL requests a reduction to a more acceptable level of one space per unit in line with the aims set out in the London Plan policy 3C.23 Parking strategy and London Plan: consultation draft replacement (October 2009) policy 6.13 Parking.

83 A number of electric vehicle charging points should be provided on the site available to all users in line with the London Plan: consultation draft replacement (October 2009) and the Electric Vehicle Delivery Plan for London (May 2009).

84 It is unclear from the Transport Assessment as to whether there is a specific staff car parking allocation and this needs to be clarified. Furthermore, there is no information in the Transport Assessment detailing how the car park will operate and a car park management plan as discussed at pre-application should be provided. It is noted that 16 motorcycle parking spaces will be provided in the basement for the hotel development.

85 The intention to provide sixty secured and covered cycle parking spaces for the hotel with showering and changing facilities for staff is welcome. TfL recommends CCTV coverage as an added security measure for at grade cycle parking. Cycle parking for the residential unit should be provided; TfL standards are 2 spaces per 3+ bed dwelling. The final number of spaces will need to be clarified in order to ensure general conformity with London Plan policy 3C.22 Improving conditions for cycling and London Plan: consultation draft replacement (October 2009) policy 6.9 Cycling.

86 Pedestrian and cycle isochrones have been provided as requested, although they lack details regarding what sort of facilities e.g. schools and GPs are located within these areas. The site benefits from the shared footway/cycleway along both sides of the A4 Colnbrook-by-pass.

87 The Transport Assessment adequately demonstrates that the development proposal due to its nature and location is unlikely to give rise to unacceptable impacts on public transport services. It is welcome that this development would be served by the Airport Hoppa Bus Service and is in general conformity with London Plan policy 3C.2 Matching development to transport capacity and London Plan: consultation draft replacement (October 2009) policy 6.3 Assessing transport capacity.

88 TfL appreciate that coaches have been taken into account but the applicant is reminded that although 12m single deck coaches still form the majority of coaches, operators tend to favour larger vehicles which can be a maximum of 15m long and/or double deck – therefore this type of vehicle should be provided for in terms of both length and height. The taxi provision outlined in the Transport Assessment is satisfactory to TfL.

89 The submitted travel plan has failed its ATTrBuTE evaluation as additional information is required in relation to travel plan targets, the action plan and funding. The targets provided in the travel plan are not specific, for example they do not indicate the amount by which the proportion of staff travelling to the hotel by single occupancy vehicle will be reduced by and are therefore not considered SMART. To enable more specific targets to be developed, baseline modal split information needs to be produced for the site, this will enable interim targets to be set that can be finalised after the initial travel survey.

90 An Action Plan needs to be included in the Travel Plan that includes short, medium and long term actions, along with timescales and responsibilities. In addition, details need to be provided on how the travel plan will be funded, including the implementation of measures, the role of the Travel Plan Coordinator and the monitoring programme.

91 These measures should all be secured through the Section 106 agreement in order to ensure general conformity with London Plan policy 3C.2 Matching development to transport capacity and London Plan: consultation draft replacement (October 2009) policy 6.3 Assessing transport capacity in which the importance of Travel Plans is highlighted.

92 TfL welcomes the applicant's commitment within the Transport Assessment to produce both a delivery and servicing plan and construction logistics plan. TfL is satisfied that the production of these plans can be subject to a planning condition if Planning Approval is granted in order to ensure general compliance with London Plan policy 3C.25 Freight strategy and London Plan: consultation draft replacement (October 2009) policy 6.14 Freight.

93 In conclusion, TfL requires clarification on the car park allocation, a car park management plan to be secured by condition and reduction in residential parking; clarification of the proposed residential cycle parking levels, further work to bring the travel plan up to TfL standard and both the delivery and servicing plan and construction logistics plan to be secured by condition.

Local planning authority's position

94 Hillingdon Council officers have yet to confirm their position.

Legal considerations

95 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

96 There are no financial considerations at this stage.

Conclusion

97 London Plan policies on hotel use and tourism, green belt, urban and inclusive design, climate change mitigation and adaptation, noise, air quality, flooding, employment and training, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Hotel use:** The principle of hotel use on a site at close proximity to Heathrow Airport is acceptable and it complies with policy 3D.7 of the London Plan.
- **Green Belt:** The very special circumstances provided by the applicant justify the inappropriate development on the portion (north – western corner) of the site currently designated as Green Belt.
- **Urban design:** The proposed design comply with the London Plan policies relating to design, including 4B.1 'Design principles for a compact city.' However the applicant should address the comments in the design section to ensure consistency with the design policies of the London Plan.
- **Inclusive design:** The concerns raised need to be addressed and conditioned.
- **Climate change mitigation and adaptation:** The proposed energy strategy is acceptable, but further information should be provided.
- **Noise:** There are no strategic noise concerns.
- **Air quality:** There are no strategic air quality concerns.
- **Flooding:** Flood risk assessment and the provision of underground rainwater storage needs to be conditioned.
- **Employment and training:** Submit employment and training strategy.
- **Transport:** Clarification car park allocation, a car park management plan to be secured by condition and reduction in residential parking; clarification of the proposed residential cycle

parking levels, further work on the travel plan, and both the delivery and servicing plan and construction logistics plan to be secured by condition.

98 Whilst the application is broadly acceptable in strategic planning terms, on balance, the application does not fully comply with the London Plan.

99 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Urban design:** Address the concerns as commented in the design section.
- **Inclusive design:** Address the concerns raised in the inclusive design section.
- **Climate change mitigation and adaptation:** Provide further information.
- **Flooding:** Submit flood risk assessment and provide underground rainwater storage.
- **Employment and training:** Submit employment and training strategy.
- **Transport:** Provide clarification in relation to car park allocation, residential cycle parking levels, submit a car park management plan to be secured by condition and reduction in residential parking; further work on the travel plan, and both the delivery and servicing plan and construction logistics plan to be secured by condition.

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