

DELEGATED DECISION

- Please select each of the categories that enables this application to be determined under delegated powers
 - Criteria 1 to 5 or criteria 7 to 9 must be addressed for all categories of application, except for applications for Certificates of Lawfulness, etc.

APPROVAL RECOMMENDED: GENERAL

Select an Option

1.	No valid planning application objection in the form of a petition of 20 or more signatures, has been received	☐
2.	Application complies with all relevant planning policies and is acceptable on planning grounds	☐
3.	There is no Committee resolution for the enforcement action	☐
4.	There is no effect on listed buildings or their settings	☐
5.	The site is not in the Green Belt (but see 11 below)	☐

REFUSAL RECOMMENDED: GENERAL

6.	Application is contrary to relevant planning policies/standards	☐
7.	No petition of 20 or more signatures has been received	☐
8.	Application has not been supported independently by a person/s	☐
9.	The site is not in Green Belt (but see 11 below)	☐

RESIDENTIAL DEVELOPMENT

10.	Single dwelling or less than 10 dwelling units and/or a site of less than 0.5 ha	☐
11.	Householder application in the Green Belt	☐

COMMERCIAL, INDUSTRIAL AND RETAIL DEVELOPMENT

12.	Change of use of retail units on site less than 1 ha or with less than 1000 sq. m other than a change involving a loss of A1 uses	☐
13.	Refusal of change of use from retail class A1 to any other use	☐
14.	Change of use of industrial units on site less than 1 ha or with less than 1000sq.m. of floor space other than to a retail use.	☐

CERTIFICATE OF LAWFULNESS

15.	Certificate of Lawfulness (for proposed use or Development)	☐
16.	Certificate of Lawfulness (for existing use or Development)	☐
17.	Certificate of Appropriate Alternative Development	☐

CERTIFICATE OF LAWFULNESS

18.	ADVERTISEMENT CONSENT (excluding Hoardings)	☐
19.	PRIOR APPROVAL APPLICATION	☐
20.	OUT-OF-BOROUGH OBSERVATIONS	☐
21.	CIRCULAR 18/84 APPLICATION	☐
22.	CORPSEWOOD COVENANT APPLICATION	☐
23.	APPROVAL OF DETAILS	☐
24.	ANCILLARY PLANNING AGREEMENT (S.106 or S.278) where the Heads of Terms have already received Committee approval	☐
25.	WORKS TO TREES	☐
26.	OTHER (please specify)	☐

The delegation powers schedule has been changed. Interim Director of Planning, Regeneration & Public Realm can determine this application

Case Officer:

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informative's are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DETAILS SHOULD BE USED IN THE PS2 RETURNS ODPM

Item No.	Report of the Interim Director of Planning, Regeneration & Public Realm
Address:	AXIS HOUSE 242 BATH ROAD SIPSON
Development:	Erection of a hotel and associated access, parking, landscaping and refuse storage.
LBH Ref Nos:	43794/APP/2021/3685
Drawing Nos:	PL(00)150 Transport Cover Letter (22-02-23) (Ref: 221497/ml/KL) Access Statement (Rev. A) PL(00)002 (Rev. C) PL(00)100 (Rev. B) PL(00)005 (Rev. B) PL(00)006 (Rev. B) PL(00)007 (Rev. B) PL(00)008 (Rev. B) PL(00)010 (Rev. B) PL(00)004 (Rev. B) Updated Sequential Test Design and Access Statement (June 2022) Additional Transport Note (05-04-22) Flood Risk Assessment 211379/FRA/JR/RS/02 (Rev. A) (04-04-22) Heritage Statement (November 2021) (Revised April 2022) Landscaping Strategy PR123763 10 (April 2022) Landscape Management and Maintenance Plan PRI23763 Man (April 2022) PR123763 11 Sheet 1 (April 2022) PR123763 11 Sheet 2 (April 2022) PRI23763 Spec (April 2022) Air Quality Statement (July 2018) Noise Impact Assessment Report Sustainability & Energy Statement (27-08-21) TRP_242BATHRD_2 (Rev. D) Waste and Recycling Strategy (May 2022) Wind Microclimate Desktop Study Report Arboricultural Implications Assessment Daylight/Sunlight and Overshadowing Assessment (Rev. A)

Planning Fire Statement
 PL(00)200
 Phase 1 Non-Intrusive and Phase II, Intrusive, Site Investigation (May 2018)
 Planning Statement (November 2021)
 Construction Logistics Plan (September 2021)
 Travel Plan (September 2021)
 Transport Statement (September 2021)
 PL(00)101 (Rev. B)
 PL(00)001 (Rev. D)
 Updated Transport and Drainage Note

Date Plans received:	17-12-21	Date(s) of Amendments(s):	23-02-23
			26-10-22
Date Application valid	17-12-21		10-10-22
			07-10-22

1. SUMMARY

The proposed development seeks to erect a 7-storey, 157-bedroom hotel on the western half of the car park area associated with Axis House, which was converted from office to residential uses in 2015-2016 to allow its use as a block of 71 flats.

This application follows previous permissions granted for a hotel on this site, most recently for a 6-storey, 157-bedroom hotel, which also re-provided 50 parking spaces at ground and basement level for the residents of Axis House, however these permissions have all lapsed without implementation.

Whilst the use of the site as a hotel would not be in keeping with the general thrust of the London Plan and the Hillingdon Local Plan, which encourage hotels to be sited within town centres, the specific locational requirements of the site (adjacent to Heathrow and the Strategic Highway Network) together with the previous consents and having regard to the submitted sequential assessment mean that in principal the proposed land use is considered acceptable.

Moreover, whilst clearly introducing a substantial amount of built form into an empty site, it is considered that the scale would be broadly in keeping with the surrounding context of Bath Road and the design rationale is supported. The proposal would further not have a significant impact on neighbouring amenity.

However, the proposal would be built on an area of car parking which has been safeguarded, through conditions associated with the multiple planning permissions on site, for use by the residents of Axis House reducing the number of parking spaces available Axis House to 28. No convincing justification has been put forward to justify the reduced number of car parking spaces for existing Axis House residents and there are concerns that this reduction of on-site parking would add considerable pressure to on-street parking in the local area, which is considered to already be either at or over capacity, to the detriment of highway safety.

Additionally, whilst it is noted that the western half of the wider site (the area subject to this planning application) has been artificially separated from Axis House by introducing raiseable bollards and appears to be under different ownership to the eastern half of the site, the planning permissions

which secured the residential use of Axis House, including the conditions which secured the amount and location of residential parking provision, related to the whole site (both halves). These conditions run with the land and are enforceable as the permissions have been implemented, and are therefore still relevant to any subsequent application for any part of the site, whilst land ownership is not a relevant consideration of the planning process.

On this basis, the proposal is recommended for refusal.

2. RECOMMENDATION

REFUSAL for the following reasons:

1. NON2 Parking and Highways

The proposed development, as a result of its siting would lead to the partial loss of residential parking secured for the occupants of Axis House. This in turn would lead to a significant amount of displaced parking from the Axis House site onto the local highway on-street parking bays which would increase the pressure for on-street parking bays, exacerbate injudicious and unsafe highways conditions, and restrict the free flow of traffic. The proposal would therefore be contrary to Policies T2, T4, T6, and T6.1 of the London Plan (2021) and Policies DMT1, DMT2 and DMT6 of the Hillingdon Local Plan: Development Management Policies (2020).

2. NON2 S106

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 Air Quality, Carbon Offsetting, Travel Planning, Employment Strategy and Construction Training, Public Realm Improvements, Hospitality Training, Highways Works, and Project Management and Monitoring). The scheme therefore conflicts with Policy DF1 of the London Plan (2021), Policy DMCI 7 of the Hillingdon Local Plan: Development Management Policies (2020) and the Planning Obligations Supplementary Planning Document (2014).

INFORMATIVES

1. I52 Compulsory Informative (1)

The decision to REFUSE 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. I74 Community Infrastructure Levy (CIL) (Refusing Consent)

This is a reminder that Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), should an application for appeal be allowed, the proposed development would be deemed as 'chargeable development' and therefore liable to

pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This would be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2019.

For more information on CIL matters please visit the planning portal page at:
www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

I53 Compulsory Informative (2)

The decision to REFUSE 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 (2021) and national guidance.

DMAV 1	Safe Operation of Airports
DMAV 2	Heathrow Airport
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 4	Visitor Attractions
DME 5	Hotels and Visitor Accommodation
DME 6	Accessible Hotels and Visitor Accommodation
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
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 D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D9	(2021) Tall buildings
LPP E10	(2021) Visitor infrastructure
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
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 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 T6.1	(2021) Residential 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
LPP T8	(2021) Aviation

3. CONSIDERATIONS

3.1 Site and Locality

The application site is situated within the car park of Axis House, a former office building to the east which is now used for residential purposes comprising of 71 flats. The site is bounded by Egerton Way to the north and the A4 (Bath Road) to the south, whilst to the west is Strata House which is currently in use as an office. Beyond the A4 to the south, the area is characterised by a mix of hotels and offices, with Heathrow Airport beyond these, whilst the area to the north is characterised by two-storey semi-detached and terraced houses.

3.2 Proposed Scheme

The proposal seeks permission to erect a 7-storey, 157-bedroom hotel, across the western half of the existing car parking area.

The ground floor would be largely used as an undercroft parking area, accessed from Egerton Way to the north, with 23 car parking spaces proposed, including 6 wheelchair accessible spaces and three active electric vehicle charging points, alongside two coach parking spaces. The main entrance would be sited in the north-east corner, and the remainder of the ground floor would be provided as circulation space, a laundry room and space for mechanical plant.

At first floor level, hotel bedrooms would be provided around the northern and western edges of the building, with a fitness room, food preparation room, front of house space and administrative areas occupying the rest of the space. At second floor level and above, only hotel bedrooms are proposed, with a lightwell providing access to natural light for the bedrooms proposed within the middle of the building.

3.3 Relevant Planning History

43794/APP/2022/2500 AXIS HOUSE 242 BATH ROAD SIPSON

Change of use of parking spaces from residential use to a paying public car park.

Decision: 09-12-2022 Refusal

43794/APP/2018/2779 AXIS HOUSE 242 BATH ROAD SIPSON

Erection of a 6-storey 157-bedroom hotel including plant room on the roof, the excavation of a basement to provide car parking and associated landscaping.

Decision: 19-02-2019 Approval

43794/APP/2017/3704 AXIS HOUSE 242 BATH ROAD SIPSON

Erection of a 5-storey 128 bedroom hotel including the excavation of a basement to provide 50 car parking and associated landscaping

Decision: 05-12-2017 Approval

43794/APP/2016/4445 AXIS HOUSE 242 BATH ROAD SIPSON

Erection of a part 4-storey, part 7-storey 150 bedroom hotel (Use Class C1) including the excavation of a basement to provide 62 car parking spaces and associated landscaping.

Decision: 18-08-2017 Refusal

43794/APP/2015/2822 AXIS HOUSE 242 BATH ROAD SIPSON

Conversion of roof space to habitable use to include a rear dormer and a side dormer and 17 rooflights to create 6 x 1-bed and 1 x 2-bed self contained flats with associated parking

Decision: 15-10-2015 Approval

43794/APP/2015/1272 AXIS HOUSE 242 BATH ROAD SIPSON

Conversion of roof space to habitable use to include a rear dormer and a side dormer and 8 x rooflights to create 7 x 1-bed and 1 x 2-bed self contained flats with associated parking

Decision: 20-07-2015 Refusal

43794/APP/2014/1542 AXIS HOUSE 242 BATH ROAD SIPSON

Change of use of offices to 64 Flats (Application for Prior Approval under Schedule 2 Part 3 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended))

Decision: 27-05-2014 Prior Approval
N/Req

43794/APP/2013/3855 AXIS HOUSE 242 BATH ROAD SIPSON

Change of use of offices to 32 Flats (Application for Prior Approval under Schedule 2 Part 3 of the Town and Country Planning (General Permitted Development) Order 1995 (as amended))

Decision: 07-02-2014 Prior Approval
N/Req

43794/APP/2009/1539 AXIS HOUSE 242 BATH ROAD SIPSON

Glass entrance canopy to front, involving removal of existing canopy to front.

Decision: 24-09-2009 Approval

Comment on Planning History

Starting with the prior approval application to convert Axis House into 64 flats (Ref: 43794/APP/2014/1542), approved on the 24th of May 2014, the parking area currently proposed to be built on was secured by condition as a parking area for these new flats. This was shown on plan (Drawing No. PL103) and secured by Condition 1, which required details of a maximum of 64 car parking spaces, including 6 disabled parking bays and 6 motorcycle parking spaces to be submitted, however this condition was never discharged.

Following the refusal of an application to convert the roofspace of Axis House on the 20th of July 2015 into 8 additional flats (Ref: 43794/APP/2015/1272), a subsequent application to convert the roofspace into 7 flats was approved, as external amenity space provision was now going to be provided and the units were now of an acceptable standard internally (Ref: 43794/APP/2015/2822). This permission was subject to condition 4 (Landscaping) and 5 (Parking Allocation Scheme), and relevant details were submitted and approved and approved on the 31st of October 2016 (under reference 43794/APP/2016/2814). The submitted and approved plan (PL103 Rev. G) under that application shows an external amenity area adjacent to Egerton Way, 80 car parking spaces across the site, with 8 specifically allocated in the south-west corner for the additional 8 units approved under the full application (Ref: 43794/APP/2015/2822).

The above planning history relates to Axis House only, however is clearly relevant as it establishes the level of parking to be safeguarded for the residents of Axis House, which would be nearly completely removed if the current application were approved, retaining 28 car parking spaces for the existing residents of Axis House. It should further be noted, however, that there is a recently refused application for these spaces to be converted from residential use to a private, paid-for car park, which would have been open to the public (Ref: 43794/APP/2022/2500).

In this respect, the first application for a hotel in this location (Ref: 43794/APP/2016/4445) was explicitly refused because "the proposal has not demonstrated that sufficient off street parking would be provided for the residents of Axis House residents and visitors and users of the hotel", with 30 spaces retained for Axis House as part of that refused application. A subsequent application was submitted (Ref: 43794/APP/2017/3704), which was approved on the 11th of October 2017, and which overcame this previous reason for refusal by re-providing 30 spaces at surface level in addition to 20 basement spaces (50 total), which was considered an acceptable compromise.

The most recent application (Ref: 43794/APP/2018/2779), approved on the 3rd of April 2019, was for a 6-storey, 157-bedroom hotel, which also re-provided 50 parking spaces for the residents of Axis House. This most recently approved application is similar to the current proposal, with the main difference being the addition of one more storey (to seven storeys), the removal of the basement level and a reduction in the number of re-provided parking spaces for the residents of Axis House. .

4. Advertisement and Site Notice

4.1 Advertisement Expiry Date: 16th February 2022

4.2 Site Notice Expiry Date: 16th February 2022

5. Comments on Public Consult

EXTERNAL CONSULTTEES

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (25-01-22): I have looked at the information you have supplied and at the Greater London Historic Environment Record. I have recommended below what more information I would need to advise the planning authority on the effects on archaeological interest and their implications for the planning decision.

The planning application lies in an area of archaeological interest.

The planning application was accompanied by a Heritage Statement (Andrew Josephs Associates 2021) which states that it also covers archaeology. As the site is located in an Archaeological

Priority Area (APA) as defined by the Borough's Local Plan, it is generally required that planning applications in the APA be accompanied by an archaeological desk-based assessment. Unfortunately the Heritage Statement does not contain the information I need to make an informed decision on the planning application in regards to impacts on potential archaeology.

The report states that there was an issue with the GLHER data supplied, which had corrupted and had to be resupplied. The Heritage Statement states that a new search was commissioned but it was not included in the Heritage Statement. Our records show that the new search was supplied on the same day we were notified of the error and the missing information has been supplied. The Heritage Statement therefore does not contain a full GLHER search, one of the main requirements for a desk based assessment. The missing GLHER data has the potential to affect the conclusions of the report, as a full picture of the archaeological background of the site has not been provided.

The Heritage Statement does not contain a discussion of the archaeological background of the site by phase, although the more general nearby APA descriptions are produced verbatim. This is misleading and confusing as the majority of the APA references are not in the vicinity of the site. The data from the GLHER, the APA within which the site is located and other available online resources should be discussed by phase.

The Heritage Statement reproduces the 2016 London Plan, which was replaced in March 2021. This section should be updated.

There is no detail in the Heritage Statement relating to the proposed development and its likely impact on potential archaeological deposits. A basement is proposed on the site so potential impacts on below ground deposits are likely to be substantial. Potential impacts from the development should be discussed in detail. Site specific geotechnical information for the site was supplied with the planning application, which suggests that brickearth is present on the site at a fairly shallow depth. As the presence of brickearth can be an indicator for the presence of potential prehistoric settlement, the results of the geotechnical investigations and their significance should be discussed within the report. The geotechnical investigations can also be used to indicate potential for any truncation of archaeological horizons on the site.

I recommend that the Heritage Statement be updated in line with my comments and resubmitted so that I can then advise on whether an archaeological condition for the site is necessary.

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (09-06-22): The planning application lies in an area of archaeological interest. I previously commented on the submitted archaeological desk-based assessment, suggesting a number of revisions. My comments have been incorporated into the revised assessment which is now of an acceptable standard to allow an informed decision to be made on an archaeological condition for the site.

The site lies within the Heathrow APA. This APA also includes the APAs of Harlington and Sipson which are nearby. Extensive remains of prehistoric and Roman date have been found in the Heathrow area, located at the top of the natural brickearth.

Geotechnical information for the site indicates that the overburden over the top of the natural brickearth is relatively thin. Whilst a basement is no longer proposed, extensive impacts from pile caps, ground beams and services are likely.

I have looked at this proposal and the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains and field evaluation is needed to

determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development is such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. I therefore recommend conditions to secure this.

HAMONDSWORTH AND SIPSON RESIDENTS' ASSOCIATION (03-02-22): The Heathrow Villages, under no stretch of the imagination, requires yet another hotel, especially since January 2020 when the Covid pandemic meant many of the hotels closed or were required by the government to change their purpose to either becoming a quarantine building or temporary, inadequate housing for refugees and asylum seekers.

Any person/s applying for a change of use should be considering the needs of the existing local community and what is actually missing for local residents and the guests of hotels still trading. Another hotel offers no value to the local community, in fact it is more probable it will have a detrimental impact on the daily lives of the residents; particularly those living in the neighbouring Axis House (an office block which was converted into residential living). This new hotel is not offering a service to the community but adding to the frustration of the nearby residents because their access to outdoor space will disappear.

Hotels do not provide employment for locals, as the companies prefer to 'import' staff from other establishments. The Heathrow villages should not be exposed to any further damaging developments; residents want to have easy access to services other communities take for granted.

HEATHROW SAFEGUARDING (31-01-22): The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to a condition regarding radar mitigation.

Further conditions relating to landscaping (so as not to attract birds), the use of cranes and lighting should also be attached.

LONDON FIRE BRIGADE (07-12-22): The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

METROPOLITAN POLICE (17-03-22): If you can adhere the standard Secured By Design accreditation required condition that would be appreciated.

MINISTRY OF DEFENCE - RAF NORTHOLT (28-03-22): 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 7.9km from the centre of the airfield.

After reviewing the application documents, I can confirm the MOD has no safeguarding objections to this proposal.

NATIONAL AIR TRAFFIC SERVICE (27-01-22): NATS has identified a detrimental impact upon its radar located at Heathrow Airport. This radar, known as H10 PSR/SSR, provides data to the NATS London Terminal Control Centre located in Swanwick, Hampshire as well as to a number of airports in the South.

The users of the radar provide an En-route air traffic service as well as an Approach function to a number of airfields. Data from this radar is also provided to other aviation operators.

Following a technical assessment, NATS is satisfied that the proposed development is expected to impact its operations and cause an unacceptable impact. However, NATS can also confirm that it is content that the impact can be mitigated through a modification to the radar system.

Accordingly, NATS would be supportive of the LPA granting the scheme subject to the imposition of the standard aviation conditions relating to radar mitigation.

THAMES WATER (08-06-22): With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection.

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests a condition requiring a Piling Method Statement to be submitted for approval.

TRANSPORT FOR LONDON (03-02-22): The site of the proposal is located adjacent to the A4 Bath Road, which forms part of the Transport for London Road Network (TLRN).

A total of 24 car parking spaces and two dedicated service drop-off and coaching parking spaces will be provided on-site. This includes six disabled persons car parking spaces. The Council might wish to request prior to determination for a swept path analysis to be provided to show that vehicles can move adequately through and to the car park/the service drop off and coaching parking spaces to ensure adequate provision is made. Points of concern are raised in terms of anticipated vehicle movements within the car park, specifically car parking bays number 22 and 23. TfL would also like to draw to your attention that in line with the London Plan all operational parking must provide infrastructure for electric or other Ultra-Low Emission vehicles which should be secured by condition. However, this has not been specified and this should be clarified.

The Transport Statement (TS) indicates that a new layby will be created in front of the hotel along Egerton Way. Whilst this is intended to 'provide a wider width of carriageway to allow vehicles to pass any parked cars safely', there are concerns about the proposed arrangement and how this will adversely affect pedestrian flows and desire lines and potentially impact on the safe and efficient operation of the service drop off and coaching parking spaces. It should be noted that the provision of a layby and proposed landscaping features should not result in the loss of footway facility on Egerton Way. This is particularly important, as there is no footway on the northern side of Egerton Way, as an alternative walking route. Furthermore, on-site servicing operations should not impact safety or impede vehicle or pedestrian flow in any way. Full consideration of the implications of the proposed location of the layby should be incorporated to ensure adequate space is provided for active travel infrastructure and on-site servicing operations. Further detail is required to demonstrate how the proposed on-site service drop off and coaching parking arrangements will operate alongside the new layby, particularly when the layby is occupied by vehicles.

London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. The TS indicates that eight long stay

cycle parking spaces and four short stay cycle parking spaces will be provided. Whilst the quantum of cycle parking is in accordance with policy, all these spaces are to be located within a bike store at the rear of the proposed car park. TfL would like to draw to your attention that cycle parking must be convenient and readily accessible for employees, guests, messengers and other visitors. TfL encourage the applicant to consider the relocation, at least of the short-stay cycle parking nearer the hotel entrance and the service entrance, ensuring cyclists can use facilities safely.

Further to the above point, all cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS). This includes the provision of spaces for larger cycles for long stay and short stay cyclists.

The implementation of a Travel Plan (TP) is welcomed by TfL. A staff and guest TP should aim to promote active modes and public transport use. In order to support the TP, facilities associated with sustainable travel modes should be provided, including showers, lockers and changing facilities for staff. As well as encouraging walking and cycling, public transport use consideration should be given to the provision of a mini bus service from a convenient station and/or a shuttle service to/from Heathrow airport. This could be arranged through a dedicated service or through an existing operator.

Whilst the Construction Logistics Plan (CLP) is welcomed and the contents of this document is found to be broadly acceptable, TfL requests that a Delivery and Servicing Plan (DSP) is also submitted to and approved by the Council in conjunction with TfL. Both the CLP and DSP should be finalised in accordance with TfL guidance and secured by condition.

Further to the above point, the development should not impact the operation of the TLRN neither during construction nor at end state. The finalised CLP should include infrastructure protection measures, if necessary, in respect of the TLRN. This should include measures to protect the trees on the footway of A4 Bath Road from damage/ destruction caused by construction activities. The Council should therefore discharge the CLP in consultation with TfL prior to construction commencing to ensure the construction works will not have an adverse impact on the TLRN, in line with policy T7 Deliveries, servicing and construction of the London Plan.

Subject to the above comments and issues raised being addressed satisfactorily, TfL do not believe that the proposed development would have a significant detrimental impact on the TLRN.

TRANSPORT FOR LONDON (14-06-22): The site is located on Bath Road, which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for those roads and is therefore concerns about any proposal that could have an adverse impact of the safety and performance of the TLRN. The site is also served by 12 bus routes, operating from bus stops along Bath Road.

The proposal is for the erection of a 7 storey hotel building comprising of 157 rooms with associated access, parking, landscaping and refuse storage.

The proposed access points will remain along Egerton Road as per the existing site, with a crossover on the eastern side for delivery and coach drop off.

London Plan Policy T5 sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. The cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Cycle parking facilities should be provided for larger cycles, including adapted cycles for

disabled people. It is noted that Table 10.2 of the London Plan requires 1 long stay for 20 bedrooms should be provided in addition of short stay requirements of 1 space per 50 bedrooms. A total of 8 long stay cycle parking and 4 short stay cycle parking, which meets Policy T5.

The site has a PTAL rating of 4, on a scale of 0 to 6b, where 6 is highest. London Plan policy T6 states that car-free developments should be the starting point for all developments that are well connected by public transport (and) in the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing. The development proposes a total of 24 car parking spaces, 6 of which are proposed to be disabled parking spaces, which is welcome. The remaining 18 parking spaces are for operational uses, which does not meet London Plan Policy T6.4. TfL does not support the provision of 18 operational parking spaces in line with Policy T6 and requires further justification. All operational parking must provide infrastructure for electric or other UltraLow Emission vehicles, including active charging points for all taxi spaces in line with Table 10.6 of the London Plan. The applicant should confirm the blue badge and EV provision proposed. TfL request swept path plan for coaches and refuse vehicle to be provided to fully assess the safety of the proposal.

London Plan Policy T7 states that the provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Delivery and servicing is proposed to take place off street using the service drop-off parking spot to the northeast of the site, which meets Policy T7. The refuse stores is located towards the east side of the site, with vehicles having to reverse up to the bin store, which does not meet Policy T7, however it is for the borough as the highway authority to determine its acceptability.

The trip generation for the proposed development indicates an increase of 55 trips in the AM peak and 39 in the PM peak across all modes. The proposed increase in trips can be accommodated on the TfL strategic network. The vehicle impact of the trips should be considered by the Council as highway authority for the site access roads.

A Construction Logistic Plan has been submitted and should be approved by the Council as planning.

No construction or servicing vehicles shall park/ load/ unload/ wait on A4 Bath Road at any time, and no construction materials/ skips should be kept on the TLRN public highway at any time.

Adequate protection measures should be employed to protect trees on the footway of A4 Bath Road from damage/ destruction caused by construction activities. TfL reminds the applicant that TfL will not hesitate to take action if plants/ trees on the TLRN have been tempered/ damaged by construction activities related to the proposal.

INTERNAL CONSULTEES

AIR QUALITY OFFICER (24-09-22): The proposed development is located within the LBH Air Quality Management area (AQMA), and within the A4 Corridor LBH Focus Area (FA), bringing additional traffic emissions which will add to current poor air quality.

As per the London Plan and LBH Local Action Plan 2019-2024, developments need to be neutral as minimum and positive in Focus Areas, contributing to the reduction of air pollutant emissions in these sensitive locations. 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. Finally, the London Plan (March 2021) requires development to be air quality neutral as minimum and air quality positive in certain circumstances, actively contributing to reduce pollutant emissions to the atmosphere.

The proposed development is NOT Air Quality Neutral. Further, according to LBH, 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 needs to be mitigated, and this would partially require off-site measures, secured as an obligation for a financial contribution of £97,937 (applying the relevant reductions). This assumes sustainable measures are implemented on site, and if these on-site measures are not implemented a higher cost of £130,583 would be due.

Therefore, a section 106 agreement with the LAP of £97,937 (in the instance mitigation as listed above is provided) or £130,583 (in the instance no further mitigation is offered) 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.

In addition, two Air Quality conditions are required to develop and implement a Low Emission Strategy and manage construction emissions as required by the Mayor of London.

ACCESS OFFICER (13-03-22): This proposal for a 157 bedroom hotel has been assessed against the requirements of London Plan policy D5, D12 and E10. 23 per car parking spaces are proposed and six accessible bays are shown on plan. The accessible bedrooms are interspersed throughout the building on all seven floors. Two lifts are shown within the entrance lobby adjacent to the stair core on the eastern side of the building. Insufficient detail is provided within the submitted Design & Access Statement to provide confidence that accessibility and inclusion has been considered throughout the design process, and the following accessibility observations are therefore provided:

The accessible parking bays should be designed in accordance with BS 8300-1:2018, and should be equipped accordingly with active and passive EVC points.

9% of the proposed bedrooms should be fully accessible to wheelchair user guests. A further 1% (2 rooms) should be fitted with a tracked hoist system and have an adjoining door to a standard bedroom.

The ensuite bathrooms within the accessible guestrooms should be designed to accord with the design and layout set out in BS 8300-1:2018, Figure 30.

An evacuation lift is required as per the requirement of London Plan policy D5 and D12 to ensure safe, dependable and dignified means of escape for all building users. Plans and the supporting D & A Statement should be updated accordingly.

The proposed 4th, 5th, 6th and 7th floors should provide adequate fire protection and compartmentation to ensure that the route to the evacuation lift does not become inaccessible due to fire or smoke spread. Plan should be amended accordingly.

ACCESS OFFICER (23-05-22): This proposal for a 157 bedroom hotel has been assessed against

the requirements of London Plan policy D5, D12 and E10. 23 per car parking spaces are proposed and six accessible bays are shown on plan. The accessible bedrooms are interspersed throughout the building on all seven floors. Two lifts are shown within the entrance lobby adjacent to the stair core on the eastern side of the building. Insufficient detail is provided within the submitted Design & Access Statement to provide confidence that accessibility and inclusion has been considered throughout the design process, and the following accessibility observations are therefore provided:

No details appear to have been submitted to demonstrate compliance with a design and layout that meets BS 8300-1:2018, Figure 30.

1% (2 rooms) should be fitted with a tracked hoist system and have an adjoining door to a standard bedroom.

An evacuation lift is required as per the requirement of London Plan policy D5 and D12 to ensure safe, dependable and dignified means of escape for all building users. Plans and the supporting D & A Statement should be updated accordingly.

The proposed 4th, 5th, 6th and 7th floors should provide adequate fire protection and compartmentation to ensure that the route to the evacuation lift does not become inaccessible due to fire or smoke spread. Plan should be amended accordingly.

ACCESS OFFICER (17-10-22): This proposal for a 157 bedroom hotel has been reassessed following submission of amended plans in response to the previous accessibility comments. The plans are now satisfactory subject to conditions.

CONTAMINATED LAND OFFICER (03-02-22): The submitted details have already been submitted for previous applications on this site, where they were considered acceptable. This remains the case.

ENERGY OFFICER: No comments received.

FLOOD AND DRAINAGE OFFICER (01-03-22): An FRA and Drainage Strategy has been produced by Lanmoor dated September 2021. Objection The proposal is to include a tank to control surface water to 2ls from the site. 1ls is more appropriate for a site with a green field run off rate of 0.3ls. Infiltration is dismissed as it is Clay but not site specific investigations have been undertaken. A pumping station is also proposed, although not detailed in the description of the proposed drainage design. This is not acceptable. However it is stated that the roof will provide the opportunity to implement a green roof as part of the drainage design. Rainwater harvesting is also discounted without sufficient detail. Without confirmation that a green roof will be installed this is an unsustainable solution which is unacceptable. A maintenance plan has been submitted and a management company will be responsible for the site drainage.

FLOOD AND DRAINAGE OFFICER (13-07-22): We object to the application for the following reasons:

- The drainage drawing should be updated to show the proposed sewer connection and the location of the blue roof.
- The applicant is required to confirm the method of flow restriction on site.
- The applicant states that the proposed runoff rate from the site will be 1.0l/s in section 5.2.6, but then cites a proposed runoff rate of 2.0l/s in section 11.1.2. Clarification is required over the proposed runoff rates, and calculations should also be provided to support these.

- Cannot assess application due to missing attenuation volume information (require the proposed attenuation volume and the volume of attenuation required to achieve the proposed runoff rate).
- Calculations must be provided to show that the site will not flood in the 1 in 30 and 1 in 100-year events. Information on how exceedance flows will be managed must be provided (and should also be shown in the drainage drawing).
- The drainage strategy does not contain the maintenance tasks and frequencies for the blue and green roofs. The name of the management company who will be responsible for the site drainage should also be provided.
- Consent for the proposed discharge point connection has not been provided and this is required.

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

- Shows the proposed sewer connection and the location of the blue roof.
- Demonstrates the method of flow restriction on site.
- Clarifies the proposed runoff rates, to be supported with calculations.
- Shows the proposed attenuation volume and the volume of attenuation required to achieve the proposed runoff rate.
- Shows calculations which shows that the site will not flood in the 1 in 30 and 1 in 100 year events.
- Shows how exceedance events will be managed, which should also be demonstrated in the drainage drawing.
- Demonstrates a maintenance strategy for the blue and green roofs, and name of the management company who will be responsible for the site drainage.
- Demonstrates consent for the proposed discharge point connection.

FLOOD AND DRAINAGE OFFICER (24-10-22): We object to the application for the following reasons:

- Calculations should be provided to support the proposed runoff rates.
- Cannot assess application due to missing attenuation volume information (require the proposed attenuation volume and the volume of attenuation required to achieve the proposed runoff rate).
- The exceedance flows should be clear in the drainage drawing.
- The name of the management company who will be responsible for the site drainage should be provided.
- No further information has been provided on the opportunity to implement a green roof, and maintenance tasks and frequencies have not been provided for the green roof.
- Consent for the proposed discharge point connection has not been provided and this is required.

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

- Demonstrates the calculations to support the proposed runoff rates.
- Shows the proposed attenuation volume and the volume of attenuation required to achieve the proposed runoff rate.
- Shows clearly how exceedance events will be managed in the drainage drawing.
- Demonstrates that the site will not flood in the 1 in 30 and 1 in 100 year events with the proposed runoff rate (1.0l/s).
- Demonstrates further information on the opportunity to implement a green roof, and therefore provides a maintenance strategy for the green roof.
- Provides the name of the management company who will be responsible for the site drainage.
- Demonstrates consent for the proposed discharge point connection.

HIGHWAYS OFFICER (12-09-22): A planning application has been received seeking permission to

build a 157no. bedroom hotel with 23no. car parking spaces on a site situated just behind the A4 Bath Road along Egerton Way. Access to Egerton Way is gained from Bolton's Lane which leads off the Bath Road. Parking along Egerton Way is controlled by double yellow lines together with some pay and display parking bays, the proposal site is currently used as car park. Beyond the Egerton Way j/w Bolton's Lane are residential roads, here parking management scheme H1 is in operation which restricts parking to permit holders only 09:00 to 17:00h seven days a week. Apart from the few pay and display parking spaces, there are no on-street parking opportunities around the proposal site. The application site has a PTAL ranking of 4 bordering 3 indicating that access to public transport is reasonable compared to London as a whole.

To the east of the application site on the corner of Bolton's Lane j/w Egerton Way is Axis House, this is a residential development with 28no. car parking spaces at the front. As mentioned above, the proposal would be built upon an existing car park, the applicant states in the Transport Statement that supports the application that the residents of Axis House do not use this car park to park, going on to mention that "they have no right to park on it". To guarantee that the erection of the proposal would not take parking away from the residents of Axis House, the Highway Authority require that documents are submitted for approval that confirms the statement that they have no legal entitlement to park there. The Highway Authority does not want a situation to arise whereby parking used by the residents of Axis House is taken away resulting in them parking indiscriminately elsewhere hindering the free flow of traffic and presenting a risk to road safety. This would be contrary to the Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 1: Managing Transport Impacts, Policy DMT 2: Highway Impacts and Policy DMT 6: Vehicle Parking and the published London Plan 2021 Policy T4 Assessing and mitigating transport impacts which requires the development proposal do not increase road danger. There are highway objections to this proposal as details to support the statement that the residents of Axis House have "no right to park" on the proposal site have not been provided.

HIGHWAYS OFFICER (04-11-22): A planning application has been received seeking permission to build a 157no. bedroom hotel with 23no. car parking spaces on a site situated just behind the A4 Bath Road on Egerton Way. Access to Egerton Way is gained from Bolton's Lane which leads off the Bath Road. Parking along Egerton Way is controlled by double yellow lines together with some pay and display parking bays, the proposal site is currently used as car park. Beyond the Egerton Way j/w Bolton's Lane are residential roads where parking management scheme H1 is in operation which restricts parking to permit holders only 09:00 to 17:00h seven days a week. Apart from the few pay and display parking spaces, there are no on-street parking opportunities around the proposal site. The application site has a PTAL ranking of 4 bordering 3 indicating that access to public transport is reasonable compared to London as a whole.

The application site is currently used as a car park which has the capacity for approximately 70no. cars. To the immediate east of the application site is a former office block - Axis House, this has been converted into a residential use. As per the existing arrangement, there would be one main vehicular entrance to the proposed hotel providing access a car park and cycle store beneath the building. This main access would offer one-way working to the main parking area.

As mentioned above there would be 23no. car parking spaces, however the space numbered 22 on the proposed site plan appears unusable making the actual total 22no. spaces. Of the 22no. spaces 6no. would be blue badge/wheelchair accessible and 3no. would be provided with active/passive electric vehicle charge points. The number of car parking spaces proposed gives a ratio of 0.1no. car parking spaces per room ($157/22=0.1$), the hotel would in effect be car-free.

There would be 4no. cycle stands providing short-stay parking for 8no. bicycles and a cycle store

with 6no. cycle providing long-stay parking for 12no. bicycles. This standard of provision is in accordance with the published London Plan (2021) Policy T5 Cycling. The development would also provide 2no. coach parking spaces though 1no. of these would double up as service space meaning parking for 2no. coaches would not be always available. Access to these coach parking spaces would be provided by a simple vehicle crossover. Directly in front of the proposed hotel along Egerton Way a new layby would be provided, this would remove 2no. on-street car parking spaces.

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 Parking requires that proposal in location of PTAL 0-3 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, and aim to improve public transport reliability and reduce congestion and traffic levels. All operational parking must provide infrastructure for electric vehicles including active charging for all taxi spaces".

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: Vehicle Parking also requires that parking standards at hotels are assessed on an individual basis though taxi pick up and set down must be provided as must one coach parking space per 50no. rooms. The Hillingdon Unitary Development Plan 1998 would have required a minimum of 1no. car parking space per 5no. rooms and a maximum of 1no. car parking space per 2no. rooms.

A Transport Assessment has been provided in support of the planning application, this reports that according to the TRICS data base the development would generate 20no. arrivals in the AM Peak - when the network is busiest and 35no. departures. However, the Highway Authority is unable to accept these forecasts as the developments upon which trip generation is based are not representative, they are located on Gloucestershire, Wiltshire, Norfolk, West Yorkshire, Tyne and Wear and Cumbria. Furthermore, the size of the hotels selected range from 1,450sq.m to 2,675sq.m and are smaller than the proposal which over twice as large at 6,590sq.m.

As mentioned above the London Plan Policy T6.4 Hotel and Leisure Parking requires that proposal must be consistent with the Healthy Streets approach and Travel Plans are key to delivering this. The Travel Plan submitted alongside the application has been reviewed and is considered unlikely to be effective in achieving a mode shift away from the driver only private car in favour of active travel and public transport use. The measures in the Travel Plan are weak, the carrying out of staff surveys is supported though they are unlikely to reveal any positive modal shift trends as the measures being delivered are not much more than Travel Plan packs for staff and notice boards to raise travel awareness.

As mentioned above the application site is currently used as a car park. However, the Highway Authority are unclear from the planning application whether this car park is used either formally or informally by the residents of Axis House, this matter must be clarified as if it is used by residents, then the proposal would displace car parking on-street which could increase road danger and hinder the free flow of traffic.

There are highway objections to this proposal not because the development is car free per se but because the measure proposed on the Travel Plan are unlikely to achieve the required mode shift away from the private car in favour active travel and public transport necessary for the development to be self-sufficient in transport terms. Furthermore, it has not been shown that the redevelopment of the existing car park will not displace car parking on-street. The proposal is not in accordance with the London Plan Policy T6.4 Hotel and Leisure Parking and T4 Assessing and mitigating

transport impacts. The one-way vehicle entry and egress to the site raises further concerns as vehicles wishing to enter the site may need to wait on Egerton Way if they find their way ahead blocked by an exiting vehicle, again presenting a risk to road safety and hindering the free flow of traffic.

HIGHWAYS OFFICER (06-03-23): An application has been received seeking planning permission to build a 157no. bedroom hotel involving the excavation of a basement to provide 23no. car parking spaces. There would also be 2no. coach parking spaces though one would double up as a service bay. The site is situated just behind the A4 Bath Road on Egerton Way. Access to Egerton Way is gained from Bolton's Lane which leads off the Bath Road. The application site has a PTAL ranking of 4 bordering 3 indicating that access to public transport is reasonable compared to London as a whole.

The application site is currently used as a car park which has the capacity for approximately 70no. cars. To the immediate east of the application site is a former office block - Axis House, this has been converted into a 71no. residential apartments. It is understood that the occupiers of these flats and their visitors use this car park daily.

Parking along Egerton Way is controlled by a mix of double yellow lines, single yellow lines and pay and display bays for anyone to use. The single yellow lines restrict parking between 09:00 to 17:00h to local residents that are members of parking management scheme H1 only - outside of these hours anybody can park within the zone. A resident can only apply for a permit if the address at which they live is included on the H1 Parking Management Scheme Traffic Order, each address within the Traffic Order is able to apply for up to 10no. permits. Axis House is included in the Traffic Order, 38no. of the 71no. units within Axis House are already members of H1, 33no. are not. It is anticipated that if the proposal is built out then the Axis House occupiers not already members of H1 would apply to join. This is because where they currently park would be taken.

Parking Management Scheme H1 is split into four separate parts - Moor Lane, Harmondsworth, Sipson, and Harlington. Axis House and roads surrounding the application site are within the Sipson section. Although H1 is split into 4no. separate parts, a H1 permit holder can park anywhere within the Parking Management Scheme area. The total number of households across the whole of H1 is 2,723 of which 1,585 are permit holders.

It is reasonable to assume that the occupiers of Axis House would park on the roads nearest to their homes which are Egerton Way, Bolton's Lane, Mondial Way, Doghurst Avenue and Bath Road. The total number of households along these streets is 268no. of which 106no. already hold permits. The length of the car parking bays along these roads has been measured and it is estimated that there is space for up to 58no. cars to park - the amount of parking permits issued (106no.) is nearly double the amount of parking space available (58no.), if the proposed hotel is built out and residents that lose their parking join the Parking Management Scheme then there could be an additional 33no. permit holders, 139no. permit holders would then be competing for just 58no. on-street parking bays.

In addition to parking stress arising from the number of permit holders exceeding the amount of on-street parking available, already 106no. permit holders competing for 58no. on-street spaces, there is the additional problem of parking stress created by drivers parking illegally. This is already known to be a problem, over the period 1st January 2022 to 13th February 2023 197no. penalty charge notices were issued within H1.

The Highway Authority is concerned that the development would displace those vehicles that

currently use the car park on to the street. This would make existing parking stress worse and manifest itself in pavement parking, obstruction of driveways and accesses, hindrance to larger delivery vehicles and refuse freighters, damage to soft landscaping and footways, and cluttered, unsightly streets. Parking stress can cause tension between neighbours reduces the likelihood of children using the street for play. The proposal would be contrary to the published London Plan (2021) Policy T2 Health Streets which requires that development proposals should "reduce the dominance of vehicles on London's streets whether stationary or moving" and Policy T4 Assessing and mitigating transport impacts which states that "development proposals should not increase road danger".

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 Parking requires that parking for a hotel proposal in a location of PTAL 0-3 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, and aim to improve public transport reliability and reduce congestion and traffic levels. All operational parking must provide infrastructure for electric vehicles including active charging for all taxi spaces".

A Transport Assessment has been provided in support of the planning application, this reports that according to the TRICS data base the development would generate 20no. arrivals in the AM Peak - when the network is busiest and 35no. departures. However, the Highway Authority is unable to accept these forecasts as the developments upon which trip generation is based are not representative, they are located on Gloucestershire, Wiltshire, Norfolk, West Yorkshire, Tyne and Wear and Cumbria. Furthermore, the size of the hotels selected range from 1,450sq.m to 2,675sq.m and are smaller than the proposal which over twice as large at 6,590sq.m. The applicant has failed to provide the information needed for the Highway Authority to understand forecast trip generation.

The Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT 6: Vehicle Parking also requires that parking standards at hotels are assessed on an individual basis though taxi pick up and set down must be provided as must one coach parking space per 50no. rooms. As mentioned above 2no. coach parking bays would be provided, taking into account the profile of the likely clientele, the 2no. coach parking bays is considered acceptable. The Hillingdon Unitary Development Plan 1998 would have required a minimum of 1no. car parking space per 5no. rooms and a maximum of 1no. car parking space per 2no. rooms, this total between 31no. and 79no. car parking spaces. The number of car parking spaces proposed gives a ratio of 0.1no. car parking spaces per room ($157/22=0.1$), the hotel would in effect be car-free. As mentioned above the forecast number of trips it would generate is not known.

As mentioned above there would be 23no. car parking spaces, however the space numbered 22 on the proposed site plan appears unusable making the actual total 22no. spaces. Of the 22no. spaces 5no. would be blue badge/wheelchair accessible, this standard of provision is more than that required in the London Plan under policy T6.5 Non-residential disabled persons parking, this requires 1no. designated disabled persons parking bay and 1no. enlarged bay, 2no. in total.

There would be no active or passive electric vehicle charge points. This is counter to the London Plan Policy T6.4. Hotels and Leisure Uses Parking which requires that "all operational parking must provide infrastructure for electric or other Ultra-Low Emission Vehicles, including charge points for all taxi spaces". Operational parking is defined as "Parking for vehicles which are required for the function of a building or the activities within it. This can include spaces for fleet vehicles, taxis or loading bays, but does not include parking for personal travel such as commuting". The proposal is

therefore not in accordance with this London Plan policy.

There would be 4no. cycle stands providing short-stay parking for 8no. bicycles and a cycle store with 6no. cycle providing long-stay parking for 12no. bicycles. This standard of provision is in accordance with the published London Plan (2021) Policy T5 Cycling.

As mentioned above the London Plan Policy T6.4 Hotel and Leisure Parking requires that proposal must be consistent with the Healthy Streets approach and Travel Plans are key to delivering this. The Travel Plan submitted alongside the application has been reviewed and is considered unlikely to be effective in achieving a mode shift away from the driver only private car in favour of active travel and public transport use. The measures in the Travel Plan are weak, the carrying out of staff surveys is supported though they are unlikely to reveal any positive modal shift trends as the measures being delivered are not much more than Travel Plan packs for staff and notice boards to raise travel awareness.

There are highway objections to this proposal because it would contribute to parking stress which is counter to the published London Plan (2021) Policy T2 Healthy Streets and Policy T4. Furthermore, the proposal would not provide any electric vehicle charge points which conflicts with Policy 6.4 Hotel and leisure use parking.

TREE AND LANDSCAPE OFFICER (02-02-22): This site is situated to the west of the Axis House car park located on the north side of Bath Road. It is accessed via Boltons Lane and Egerton Way. The site is directly opposite Heathrow Airport and the rear elevation overlooks the back of the two-storey residential properties on Doghurst Avenue. The site has established perimeter planting, notably along the southern elevation fronting onto Bath Road. There are no TPO's or Conservation Area designations affecting the site.

This submission follows a number of previous applications including ref. 43794/APP/2017/3704, to build a five-storey hotel, which was approved. This was followed by application ref. 43794/APP/2018/2779 for a six-storey hotel which was also approved. The current proposal seeks to erect a seven-storey hotel with 157 bedrooms. It is understood that the footprint of the current layout will remain the same and the affect on the external works (hard and soft landscape layout) will remain unchanged.

The D&AS makes does not follow best practice inasmuch that there no analysis of the existing or proposed landscape - and no separate landscape strategy. A tree report by Arboricultural Solutions, dated July 2018 (Rev 6) is out of date and cannot be relied upon. Tree surveys are generally valid for a year or two only.

The trees will have to be re-surveyed and the report updated, however, in the meantime, it can be used as an rough guide. The submitted landscape plan is very weak and the proposals are inadequate, failing to complement or enhance the site and wider area. The source of the plan is unattributable and unreferenced/undated. The information is poorly presented and the plant schedules inadequate with plant sizes and densities more suited to a modest private garden than a prominent hotel situated at a main gateway into London. A full landscape design package, by a professional landscape architect, is required which explains the site opportunities and constraints and evolving design objectives.

This should be supported by a full package of hard and soft landscape plans and cross-sections, with details, schedules of plants and materials, specification and landscape management and maintenance specifications. The opportunities for new planting at ground level are limited and green

roofs / walls could be provided to embellish the landscape quality and biodiversity of the site, albeit the design and management of all soft landscape will require the approval of the CAA / BAA due to the proximity to the airport and concerns about the avoidance of bird-strike.

The proposed additional height of the building will exacerbate the overlooking of the residential properties in Doghurst Avenue.

Tree and landscape information, as submitted, is unacceptable, however, a similar site layout was previously approved. If you are minded to approve this application, please add conditions requiring details of a full and comprehensive landscaping scheme to be secured by condition.

NOISE OFFICER (02-09-22): Sufficient information has been provided by the Applicant to make a recommendation with respect to noise by way of assessment report, which mistakenly refers to Hounslow's policies. Whilst impact thresholds for guests may be higher than for residents it is recognised that employees may be required to be resident in the proposed hotel for longer than might reasonably be assumed for guests. Hence it is recommended that no objection is made on noise grounds subject to the inclusion of a suitable condition, which should be met based on the information provided. Considering the existing noise environment, it is considered unlikely that plant and equipment installed as part of the proposed development would have any adverse noise impact on existing premises, hence a condition is required to control these potentially adverse impacts.

PLANNING POLICY OFFICER (10-02-22): Paragraph 87 of the National Planning Policy Framework (NPPF) (2021) states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. The site is not located within or on the edge of an existing town centre. It is noted that the previous application (3794/APP/2018/2779) did not include a sequential test. Noting that this same requirement was included within previous iteration of the NPPF, one can infer that the case officer believed that the location was in accordance with an up-to-date plan.

However, since this application was approved on the 3rd April 2019, there have been significant changes to the Development Plan. This includes the adoption of both the Local Plan: Part 2 (2020) and the London Plan (2021). It is therefore necessary to assess this proposal against the new policies in the Development Plan, to determine if it is in accordance with an up-to-date plan or whether it is necessary to undertake a sequential test.

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

Regarding the London Plan, Policy 4.5 has been withdrawn as part of the adoption of the new London Plan (2021). Policy E10 provides a clear position that whilst serviced accommodation should be promoted within Opportunity Areas, this still needs to be done in accordance with the sequential test as set out in Policy SD7. This policy mimics Paragraph 87 of the NPPF (2021) and outlines that boroughs should apply the sequential test to applications for main town centre uses.

The applicant has submitted a sequential test with the application. Unfortunately, it is considered that there are significant flaws with the sequential test. It is recommended that the applicant addresses these issues and provides a more thorough sequential test. I have provided the following comments to highlight areas requiring change:

- Area of Search: I would agree with the assessment that the catchment area should only include towns within a travel time by public transport. The 20-minute travel time sounds reasonable (it is assumed this has been measured from the public transport terminus at Terminals 2 and 3). However, it is unclear why the search has been constrained to sites in LB Hillingdon only. It is considered that the following town centres may also meet this threshold: Hounslow, Southall, Feltham, Staines, Slough and Ealing.

- Sources of Data: The current sequential test appears heavily focused on allocated sites in local plans. Local plans do not typically allocate sites for hotels over a long period of time. The applicant should incorporate approved planning applications in the areas stated above to outline any pipeline of hotels on sites that have been deemed suitable.

- Commentary: The sequential test should explain why sites have been included or discounted, rather than just coming to this conclusion without any description as to why.

PLANNING POLICY OFFICER (06-07-22): Please can I request the following amendments to the sequential test to ensure we can complete our review accurately:

- Please can the applicant submit red line boundaries of the sites being referred to. The addresses give a broad area, but they do not let you decipher the site area and whether they are suitable or not.

- For some of the sites, they have been marked up as both unsuitable and unavailable. The justification though only refers to one of these criteria. It needs to refer to both (preferably in two separate columns).

- If a site is being excluded in terms of suitability, commentary should be provided to explain what is wrong with it (e.g. it would not be large enough to host a critical mass of hotel bedrooms and ancillary space).

- Please can the applicant outline how they are defining open and off market.

- Paragraph 5.9. refers to a Table 1 but I am not clear where this is. This might be a typo that needs clarifying.

- Please can the applicant provide some commentary on the source of the 20-minute public transport (e.g. what did it use, where is it taken from precisely, potentially what the map looks like with slightly different travel times for comparison).

- This is probably linked to the above, but some commentary on why the following town centres are excluded: Feltham, Staines, Slough and Ealing.

PLANNING POLICY OFFICER (27-09-22): 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 with the broad parameters of the Heathrow Opportunity Area, 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. This part of the Development Plan indicates support for hotel accommodation in this location. However, Policy DME 5 of the Local Plan: Part 2 (2020) outlines that the accessible sustainable locations suitable for visitor accommodation are defined in the Site Allocations and Designations document, which does not include this location. It should be noted that this site would have formed part of the Hotel and Office Growth Location along Bath Road, but it was subsequently removed during the examination hearings due to uncertainty in delivery due to proposals regarding the expansion of Heathrow Airport.

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 Council does not hold any information to suggest that an increase in hotel rooms could be accommodated in the town centres of Hayes and Uxbridge only. Indeed, it is not aware of any information that suggests that the pooled projections from other London Boroughs with good public transport access to the airport (e.g. Hounslow and Ealing) could be met across only the relevant town centres in Hillingdon and these boroughs combined. Whilst the Council is aware and supportive of existing and proposed hotels within its town centres, they are not of a scale to accommodate this level of demand. The Bath Road is the most prominent location for existing and new hotels in the London Borough of Hillingdon, due to its access to Heathrow Airport and is a critical source of brownfield land to meet the demand for new visitor accommodation. 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 site itself is well connected by public transport (PTAL 4) and there is only a limited quantum of visitor car parking for users. There are a number of bus routes (105/111/278/285) that would take visitors to Heathrow Terminal 2 and 3 in less than 10 mins or the associated Piccadilly and Elizabeth Lines which provide access to Central London. The proposal would therefore constitute 'a well connected' site in line with Policy E10 of the London Plan (2021) and 'a sustainable location' in line with Policy E2 of the Local Plan: Part 1 (2012).

URBAN DESIGN OFFICER (04-03-22): The planning application seeks consent to erect a 157-bedroom hotel of varying height up to 7 storeys, with 23 parking spaces, access from Egerton Way, landscaping and refuse storage.

A previous scheme was submitted and approved for a 6-storey hotel which is to a similar design to the current proposals (see application 43794/APP/2018/2779). The most significant change being the removal of the basement and the addition of a 7th storey.

It is considered that the development could provide an additional storey but there are some design concerns which are outlined below. The proposed additional storey appears 'top heavy' and affects the proportions of the building. The design is not as pleasing a composition as the consented scheme. The previous scheme incorporated a 'stepped' facade which helped to break up the upper storey. Using a similar architectural design would help to break up the two storeys and may help to reduce the upper storeys impact. Another approach may be to step the upper storeys back and introduce a parapet, so they appear more subordinate and secondary to the main body of the building.

The proposed building appears to turn its back on Bath Road with the principal entrance being to the rear of the site. The large blank brick 'Book ends' to the facade facing Bath Road are unfortunate and increase its impact. It would be appropriate for the bedroom windows to be introduced onto these brick facades to help provide visual interest and break up the elevations. The internal arrangement appears quite poor, whilst Bath Road is a harsh environment the placing of carparking and plant space on the street front and not providing a visual connection from the lobby is quite poor design.

Similarly, the breakfast hall should be placed towards Bath Road and bedrooms should be moved on the first floor towards the rear.

URBAN DESIGN OFFICER (28-07-22): I note the amended drawings which have taken into consideration previous design comments. They have addressed my concerns with the 'top heavy' upper two floors and I am now more comfortable with the arrangement.

The building turning its back onto the Bath Road has not, however, been fully resolved.

I didn't object to the principle of an additional floor subject to design and do not feel the height is excessive in this location.

WASTE STRATEGY OFFICER (22-02-22): The application states that the refuse will be collected via Egerton Way but does not outline how the dustcart will access the site safely or the distance from the bin store to the location where the dustcart can safely stop.

On Egerton road there seems to be a loading bay on the drawings but can you please confirm how the waste is proposed to be collected. What is the pull distance from the bin store to the location where the collection vehicle will safely stop and if this is in excess of 10 meters will there be provisions made to ensure that the bins are presented for collection no later than 6am on the day of collection?

If the loading bay is inaccessible at the time of collections there will be a missed collection and this will be the responsibility of the manager/hotel owner.

Also please confirm if the pathway will be clear and have dropped kerbs to allow for access.

Please complete a swept path analysis of the area the dustcart is expected to enter to ensure that there are no access restrictions or limitations.

Please ensure there is a sufficient amount of refuse and recycling containers to cope with the amount of waste generated at the site. The drawing shows that there is a plan to allow space for 6 x 1100 containers which is not sufficient for the size of this development even with daily collections.

The London Borough of Hillingdon require all new developments to have sufficient space for food waste recycling in their refuse strategy, the council is currently working to introduce food waste recycling in flats and will be looking at extending this service to commercial customers in the future

WASTE STRATEGY OFFICER (14-07-22): Can the developer please provide more information on the distance the collection crew will need to reverse to collect the waste containers. There must be sufficient space for food waste recycling, general waste containers and recycling containers and must be collected regularly. Can the waste strategy also outline the pull distance from the bin store to the location where the vehicle can safely stop.

WASTE STRATEGY OFFICER (10-11-22): No further comments.

6. Local Plan Designation and London Plan

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

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.E3	(2012) Strategy for Heathrow Opportunity Area
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise

Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMAV 2	Heathrow Airport
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 4	Visitor Attractions
DME 5	Hotels and Visitor Accommodation
DME 6	Accessible Hotels and Visitor Accommodation
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 9	Management of Flood Risk
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 14	Trees and Landscaping
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones

DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
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 D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D9	(2021) Tall buildings
LPP E10	(2021) Visitor infrastructure
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP GG2	(2021) Making the best use of land
LPP GG5	(2021) Growing a good economy
LPP HC1	(2021) Heritage conservation and growth
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 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 T6.1	(2021) Residential 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
LPP T8	(2021) Aviation

In addition: 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.

7. MAIN PLANNING ISSUES

7.1 Impact on the amenities of the occupiers of neighbouring residential properties

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.

In support of the application, a Daylight/Sunlight and Overshadowing Assessment has been submitted and reviewed by the local planning authority. The results of the submitted assessment demonstrate that the proposal would not have a significant impact on either daylight or sunlight levels for properties on Doghurst Avenue. There is no assessment of the impact on Axis House, however as a development of a very similar size and location was previously approved, it would not be reasonable to refuse the application on this basis.

Additionally, the impacts to privacy would be very limited, in part because the proposed use as a hotel would not provide a permanent place of residence and therefore occupants would be transient in nature and are unlikely to spend a significant amount of time in the hotel rooms, and in part because sufficient separation distances between facing windows would meet or exceed the 21-metre guideline.

Overall, the impacts to neighbouring occupiers from the development proposed in terms of loss of daylight/sunlight, overshadowing and loss of privacy is considered to be very minor, especially when the previously consented scheme which was of a similar scale and massing, is considered.

7.2 Impact on Street Scene

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.

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 further 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.

Also of relevance, Policy D9 of the London Plan (Tall buildings) 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.

Additionally, Policy BE1 of the Hillingdon Local Plan Part 1 (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. In addition, proposals should not result in the inappropriate development of gardens and green spaces as this could lead to the erosion of the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas.

Further, Policy DMHB 11 of the Hillingdon Local Plan Part 2 (Design of New Development) requires all developments, including extensions and new buildings, to be designed to the highest standards by harmonising with the local context in terms of its scale, height, mass and bulk in comparison to adjacent structures, together with building plot sizes, plot coverage and the established street patterns.

The proposed development would introduce a substantial amount of built form onto a previously undeveloped plot, however it is important to recognise that a now lapsed planning permission was previously granted for a 6-storey hotel on this site which was of a similar design to the current proposals (Ref: 43794/APP/2018/2779). The most significant change between the two schemes being the removal of the basement, the creation of an undercroft parking area at ground floor level and the addition of a 7th storey.

As noted from the Urban Design Officers comments, the amended scheme is considered to relate satisfactorily to its surrounding in terms of scale and bulk, with high quality external materials which would allow the scheme to include some features of architectural interest across the facade. The stepped design further helps to break up the sense of massing whilst the windows and fenestration give the scheme a human scale, and the proposal does not constitute a tall building (for the purposes of Policy D9 of the London Plan) because of the site's varied context and relationship with

the pre-existing buildings.

Whilst some concerns are raised in respect of the proposal's relationship with Bath Road, which the scheme appears to turn its back on, being mindful of the previously consented scheme for the site, it is considered that these minor design flaws would not merit a reason for refusal and the finer details of the design process can be secured by condition.

On this basis, the proposal is considered acceptable in respect of its impact on the character and appearance of the area.

7.3 Traffic Impact/Pedestrian Safety

Policy T1 of the London Plan (Strategic approach to transport) seeks development proposals to 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 development 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.

Additionally, 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 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 living there.

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, and relevant to hotel uses is Policy T6.4 (and T6.5). Policy T6.4 (Hotel and leisure uses parking) sets out that in locations of PTAL 0-3, 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, and the aim to improve public transport reliability and reduce congestion and traffic levels, whilst for areas of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing. 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.

At a borough level, Policy DMT 1 of the Hillingdon Local Plan Part 2 (Managing Transport Impacts) requires proposals to address transport impacts in a sustainable manner, whilst maximising safe, convenient and inclusive accessibility to and from within developments for all people to ensure that proposals have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly the strategic road network. The supporting text to Policy DMT 1 highlights that the strategic road network is at capacity, leading to congestion and environmental impacts, with congestion hotspots identified in the Local Plan Part 1. Bath Road (The A4) is a major east-west arterial route through the borough and a key part of the strategic road network, as part of the main route into and out of Heathrow Airport, and the junction between the M4, A4 and A408 (approximately 400 metres to the west of the application site) has been identified as a congestion hotspot, experiencing particularly high levels of traffic and associated environmental impacts. As such, proposals will be expected to include measures that do not contribute to further congestion and where possible, seek to reduce car use in the borough. Additionally, the Council will not support development which unacceptably contributes to traffic movements, especially on the strategic highway network, and proposals which adversely impact on road user safety (including pedestrians) or affect residential amenity through noise, congestion or inadequate parking provision will also be resisted.

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.

The submitted Transport Assessment outlines that the proposed development would be likely to generate a demand of 20 arrivals and 35 departures within the AM peak period, however these forecasts appear to be based on TRICS data for much smaller hotels, and in disparate areas of the country and therefore it is difficult to have confidence in the assertions within the Transport Assessment regarding demand for parking spaces. Notwithstanding the Highways Officer's concerns, the proposed hotel is comparable in size and quantum to the previously consented scheme, which was supported by reliable TRICS data for London sites, and therefore the unreliable TRICS data presented under the current application would not warrant a reason for refusal on its own. These issues could potentially be alleviated through the submission of a Travel Plan to encourage more sustainable modes of travel, however the submitted Travel Plan is considered to fall far short of the expected level and does not include the full suite of measures which would be required to drive down use of the private car.

In addition to the shortcomings of the Transport Assessment, there does not appear to have been any real consideration of the loss of the existing car park under the current planning submission, which is secured for use by the residents of Axis House. Prior applications had sought to re-provide adequate car parking for the residents of Axis House through the delivery of a basement level of car parking, to prevent displacement of car parking onto the local highway.

As the planning history for the site indicates, parking provision was secured for the residents of Axis House at much higher levels than were ever provided on-site, with 64 spaces secured under the prior approval application to convert Axis House into 64 flats (Ref: 43794/APP/2014/1542) and an additional 8 spaces secured for the 7 flats approved when the roofspace was extended (Ref: 43794/APP/2015/2822). Whilst 80 spaces were then shown on a subsequent plan to approve details, given that Axis House only contains one- and two-bedroom flats, it is reasonable to expect that a 1:1 ratio should have been provided following implementation of the two permissions and 71 spaces should have been provided. It was indicated on plan that this would include 6 wheelchair accessible spaces.

Nonetheless, it is important to have regard to the Policy T6 of the London Plan, and, based on

current London Plan standards for a residential site with a PTAL of 4 for a development of 71 one- and two-bedroom flats, 53 parking spaces would be the maximum allowed, based on 0.75 spaces per flat. In accordance with Policy T6.1 of the London Plan, applying the more restrictive parking standard when a site falls into more than one category, it is considered that the application site has a PTAL of 4, which is considered to represent a good level of access to public transport (on a scale of 0-6b, where 0 is the worst and 6b is the best). However, it should be noted that the good PTAL is slightly deceptive for this part of Bath Road as whilst the Underground Stations within Heathrow Airport are relatively close to the application site, and these improve the wider area's PTAL, there is no pedestrian or bicycle access to Heathrow Airport from Bath Road and these stations can only be reached by car or bus which restricts ease of access for residents, especially noting the very high levels of local congestion.

Previous consents for a hotel on this site had clearly sought to address this issue, including the most recent (and now lapsed) permission which re-provided 50 spaces (including 30 at surface level and 20 at basement level) for the residents of Axis House. The submission documents indicate that the residents of Axis House have never been provided with car parking in the area which is the subject of this planning application, and that post occupation, these residents have been provided with at most 30 spaces within the courtyard area to the north of the existing Axis House building (and in reality only 24 spaces, with 0 wheelchair spaces are actually available on site).

The submissions further indicate that the east and west portions of the site have been artificially split up as separate land parcels and that as a result of this, the residents of Axis House have no legal right to park within the boundaries of the application site. It is not fully explained how the applicant has arrived at this conclusion, however land ownership issues are not relevant to the planning process and splitting the ownership of this one plot does not override the need to comply with planning conditions which relate to the whole site, and does not automatically mean that they are two distinct planning units, when they are not.

As such, given that there are already very significant concerns that the existing level of parking provision is insufficient to accommodate the needs of the existing residents of Axis House (and is far below the amount secured by condition), the removal of the majority of spaces which are secured for Axis House residents has not been justified in planning terms, and has the potential to lead to a significant amount of displacement parking onto residential roads near to the application site (Egerton Way, Doghurst Drive, Mondial Way and Bolton's Lane), in an area known to have very high levels of on-street parking stress (and which are protected by parking controls).

In this regard, these four roads all fall within the H1 Parking Management Scheme, which is formed of three distinct sections which broadly cover (a) Harlington (b) Egerton Way, Doghurst Drive, Mondial Way and Bolton's Lane, and (c) south Sipson. Whilst all fall within the same umbrella Parking Management Scheme (H1), they function as sub-areas because of their distance from one another (over 200 metres on foot), and because one sub-area can only be accessed by another using part of the TfL network (Bath Road). It is therefore reasonable to assume that residents of one sub-area are unlikely to try and park within other parts of the wider H1 Parking Management Scheme, even if their was availability in a different sub-area, as this would be very inconvenient for those residents. 200 metres has been used as marker of the maximum reasonable distance a resident would park their vehicle away from their home and is based on the distance used for parking stress surveys using the Lambeth methodology.

A review of area (b) shows that there are 58 on-street parking bays within this part of the H1 Parking Management Scheme; Doghurst Avenue (11 spaces), Bolton's Lane (12-14 spaces), Mondial Way (17-19 spaces) and Egerton Way (13-14 spaces). The bays in Mondial Way and

Egerton Way are shared resident/Pay & Display, whilst the rest are all resident-only bays. Meanwhile, 68 parking permits have been issued for residents of these roads; Doghurst Avenue (19 permits), Bolton's Lane (48 permits) and Mondial Way (1 permit). Within the borough, it is possible for each household within a Parking Management Scheme to apply for up to 10 on-street permits, with the first permit free of charge, and fees for each successive permit after that. Following discussions with the Parking Permits Team, there is no mechanism in place for the Council to refuse to issue a parking permit if applied for by an eligible resident, regardless of existing parking stress in the area.

As demonstrated above, the roads within this part of the Parking Management Scheme have 58 available on-street bays, of which, only 25 are safeguarded for residents use only. Based on the number of residential permits already issued for properties on Doghurst Drive, Mondial Way and Bolton's Lane, it would appear that on-street parking availability on these four roads is already either at or over capacity, which is compounded by the frequent use of all four of these roads by idling Taxis or minicabs, which furthers the dominance of vehicles in the area.

Residents on these four roads regularly make complaints to the council about injudicious parking, often from taxis idling or waiting (linked with Heathrow Airport), and the unavailability of on-street parking for local residents as a result of this. These four roads also generate a very high number of parking tickets, disproportionate to their size, often as a result of vehicles waiting or parking on double-yellow lines, parking without a permit or ticket, or parking on the footway, with 174 parking tickets/fines issued between the 1st January 2022 and the 13th February 2023. This indicates that even with strict parking controls in place and regular enforcement (indicated by the number and frequency of tickets issued), unsafe or dangerous parking nevertheless takes place as a result of the very high demand for on-street parking locally. As the proposal has the potential to displace a high number of off-street parking onto the local roads, and these roads already appear to be at capacity in terms of on-street parking availability, injudicious parking incidents would likely become more common (and already appear very high), as more residents compete for the same number of spaces, alongside competition with minicabs and taxis. Additionally, vehicles parking or waiting on double-yellow lines increases the likelihood of a road safety incident, especially at junctions and corners, as other road users would not expect parked vehicles in these locations and would not adjust their driving behaviours accordingly.

On this basis, the proposal is considered to conflict with the intentions of Policy T2, T6, T6.1 and T6.4 of the London Plan, alongside Policies DMT1 and DMT6 of the Hillingdon Local Plan Part 2.

7.4 Carparking & Layout

Please see 'Transport Impact/ Pedestrian Safety'.

7.5 Urban Design, Access and Security Considerations

Please see 'Impact on Street Scene'.

7.6 Other Issues

PRINCIPLE OF DEVELOPMENT

Paragraph 81 of the NPPF sets out that planning decision should create conditions which mean 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, as the proposal constitutes an out-of-centre development for a main town centre use, 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. This position is recognised by the applicant, who has submitted a Sequential Test (dated November 2021), which was subsequently updated (in May 2022 and August 2022) to address comments from the council's Planning Policy Officer.

Whilst some of the assumptions within the Sequential Test (and subsequent updates) are disagreed with, such as the statement that within the Heathrow catchment area (defined as 20 minutes' travel on public transport from Heathrow underground stations), the further away from the Heathrow airport the less functional and more unviable the use of the hotel becomes, the overall conclusions of the sequential test are considered reasonable, and there are no sequentially preferable sites.

Further regard is had to the high PTAL of 4 (on a scale of 0-6 where 0 is the worst and 6 is the best), indicative of good access to public transport, although it is recognised that this PTAL is due to the proximity of Heathrow Airport underground station which can only be reached by bus or car. Bath Road is also part of the Strategic Road network with fairly direct routes east towards central London and west towards the M25 (and M4). The site also lies within the Heathrow Opportunity Area, which whilst not well defined, does identify the areas around Heathrow as capable of accommodating a significant level of growth, and there is established high demand for additional hotel spaces across London (58,000 between 2015 - 2041; 2,230 per year), but particularly within the borough which has the 3rd highest projected net demand at 4,947 rooms (or 8.5% of the total share). In this respect, the predicted high demand for hotels is based on pre-pandemic levels of tourism and the creation of a third runway at Heathrow and therefore actual demand may be lower. However assuming the targets remain unchanged it is unlikely that the predicted net increase could be accommodated within the town centres near to Heathrow alone, noting that Heathrow is the main driver of demand for hotel spaces within the borough.

As such, having regard to comments from the council's Planning Policy Officer, it is recognised that despite falling outside of a town centre, Bath Road is predicted to continue to play a role in providing a sufficient number of brownfield sites for visitor accommodation due to its good access to Heathrow Airport and high PTAL, and the proposal has demonstrated that it generally complies with the intentions of Policies GG2, GG5 and E10 of the London Plan and Policies E2 and DME 5 of the Hillingdon Local Plan (Parts 1 and 2 respectively). On this basis, the proposed land use as a hotel is considered acceptable.

AIRPORT SAFEGUARDING

Policy DMAV 1 of the Hillingdon Local Plan Part 2 (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 airport operator on proposals in the safeguarded areas. Due to its location, any development on this site has the potential to affect Heathrow Airport, and consequently Heathrow

Safeguarding, the National Air Traffic Service (NATS) and the Ministry of Defence have been consulted on this scheme. All three consultees have reviewed the proposal and are satisfied that the proposal could be delivered without harming aviation safety, subject to conditions being applied which relate to radar mitigation, bird management (in terms of landscaping) and the use of cranes.

On this basis, subject to the inclusion of the recommended conditions, the proposal is considered acceptable in respect of airport safeguarding.

IMPACT ON HERITAGE ASSETS

The application site falls within the Heathrow Archaeological Priority Area (which also includes the APAs of Harlington and Sipson which are nearby), within which extensive prehistoric and Roman remains have been found, located at the top of the natural brickearth. Archaeological Priority Areas (APAs) are designated heritage assets.

Policy HC1 of the London Plan (Heritage conservation and growth) states that proposals affecting heritage assets and their settings, should conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. Proposals should also identify assets of archaeological significance and use this information to avoid or minimise harm through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes.

In this regard, heritage 'significance' is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, or through historic associations between people and a place, and where relevant, the historic relationships between heritage assets.

Additionally, Policy HE1 of the Hillingdon Local Plan Part 1 (Heritage) states that the council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes designated heritage assets such as statutorily listed buildings, Conservation Areas and Archaeological Priority Areas and further sets out that harm to the significance of non-designated heritage assets (recognised at a local level) such as Areas of Special Local Character and locally listed buildings will also be resisted.

Also in this regard, Policy DMHB 1 of the Hillingdon Local Plan Part 2 (Heritage Assets) states that proposals are expected to avoid harm to the historic environment, and proposals which result in harm will only be allowed if it brings an asset back into viable use, it would provide public benefit that would outweigh the harm or loss, and the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials.

Policy DMHB 7 of the Hillingdon Local Plan Part 2 (Archaeological Priority Areas and Archaeological Priority Zones) specifically seeks to protect and mitigate any harm to underground heritage assets, including through the submission of a desktop study, followed by investigative groundworks (e.g. trial pits) if appropriate. This should further include proposals for the recording, archiving and reporting of any archaeological finds.

In support of the application, a Heritage Statement (November 2021) and a subsequent updated version (revised April 2022) were both submitted, and these assessed the potential impacts to heritage assets. The revised Heritage Statement was reviewed by the Greater London Archaeological Advisory Service (GLAAS), who are satisfied that the proposal would not cause harm to any buried remains subject to the inclusion of trial trenching and field evaluation to

establish whether significant archaeological remains survive, and that this be secured by condition.

On this basis, the scheme is considered acceptable insofar as it relates to heritage assets.

ENERGY

No comments were received from the council's Energy Officer however it is considered that the proposal would have been capable of achieving compliance with Policy SI2 and SI3 of the London Plan, with a 35% improvement over the baseline with any shortfall secured as a carbon offset calculation to be used to fund measures to reduce carbon emissions within the borough.

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.

Whilst this application is recommended for refusal, the following obligations would have been secured to mitigate adverse impacts of the proposal if the application was recommended for approval:

- Air Quality Positive contribution of £97, 937, potentially rising to £130, 583, to be used to fund off-site measures to reduce adverse impacts of poor air quality in the area;
- Carbon Offsetting contribution, based on £95 per tonne over a period of 30 years in accordance with Policy SI 2 of the London Plan;
- A full Travel Plan shall be submitted to 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;
- 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;
- Improvement to the public realm along Egerton Way including soft landscaping works along Bath Road, a scheme to be agreed in writing by the Council and carried out by an approved contractor;

- Hospitality Training contributions or an in-kind scheme;
- To enter into a s278 agreement to secure highway works; and
- A financial contribution equal to 5% of the total cash contributions, for Project Monitoring and Management.

8. Reference Documents

London Plan (2021)

Hillingdon Local Plan: Strategic Policies (2012)

Hillingdon Local Plan: Development Management Policies (2020)

Development Control for Noise Generating and Noise Sensitive Development SPD (2016)

Planning Obligations SPD (2014)

National Planning Policy Framework (NPPF) (2021)

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