
Planning Statement

ARIEL HOTEL, 118 BATH RD, HAYES, UB3 5AJ
DECEMBER 2023

PREPARED FOR R HEATHROW ARIEL OPCO
LIMITED

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APPENDICES

Appendix 1 – Site Location Plan

Appendix 2 – Sequential Test Site Review

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1.0 INTRODUCTION

1.1 This planning statement has been prepared by Hybrid Planning & Development Limited ('Hybrid') on behalf of our client, R Heathrow Ariel Opco Ltd., in support of a full planning application submitted to The London Borough of Hillingdon, as it relates to the redevelopment of Ariel Hotel, 118 Bath Road, Hayes UB3 5AJ ('the Site'). A site location plan showing the application site outlined in red is enclosed at **Appendix 1**.

1.2 The applicant is seeking planning permission for:

"Reconfiguration, alteration and extension of existing hotel (providing additional hotel rooms), together with erection of a new apart-hotel building on car park land to the north."

Submission Documents

1.3 This planning statement has been prepared to consider the proposed development against the statutory development plan and all relevant planning considerations. This statement should be read in conjunction with the following documents and drawings.

Table 1.1 – Planning Documents

Document	Consultant
Application Form and Certificates	Hybrid Planning & Development
CIL Additional Information Form	Hybrid Planning & Development
Application Covering Letter	Hybrid Planning & Development
Planning Statement (this document)	Hybrid Planning & Development

Table 1.2 – Drawings and Plans

Dwg no.	Title	Scale
1041-001	Site Location Plan	1:1250@A1
1041-010	Existing Site Plan	1:200@A1
1041-011	Existing Basement Plan	1:100@A1
1041-012	Existing Ground Floor Plan	1:100@A1
1041-013	Existing First Floor Plan	1:100@A1

Dwg no.	Title	Scale
1041-014	Existing Second – Third Floor Plan	1:100@A1
1041-015	Existing Fourth Floor Plan	1:100@A1
1041-016	Existing Roof Plan	1:100@A1
1041-020	Existing Elevations Plan (North and South)	1:100@A1
1041-021	Existing Elevations Plan (East and West)	1:100@A1
1041-099	Proposed Site Plan	1:200@A1
1041-100	Proposed Hotel Basement Floor Plan	1:100@A1
1041-101	Proposed Hotel Ground Floor Plan	1:100@A1
1041-102	Proposed Hotel First -Third Floor Plan	1:100@A1
1041-103	Proposed Hotel Fourth Floor Plan	1:100@A1
1041-104	Proposed Hotel Fifth Floor Plan	1:100@A1
1041-105	Proposed Hotel Plant Plan	1:100@A1
1041-106	Proposed Hotel Roof Plan	1:100@A1
1041-107	Proposed Apart-hotel Ground Floor Plan	1:100@A1
1041-108	Proposed Apart-hotel First-Second Floor Plan	1:100@A1
1041-109	Proposed Apart-hotel Third Floor Plan	1:100@A1
1041-110	Proposed Apart-hotel Roof Plan	1:100@A1
1041-120	Proposed Hotel Elevations (South and North)	1:100@A1
1041-121	Proposed Hotel Elevations (East and West)	1:100@A1
1041-122	Proposed Internal Hotel Elevations	1:100@A1
1041-123	Proposed Apart-hotel Elevations (South and North)	1:100@A1
1041-124	Proposed Apart-hotel Elevations (East and West)	1:100@A1
1041-125	Proposed Boundary Elevations	1:200@A1
1041-130	Proposed Section AA	1:100, 1:1000@A1
1041-131	Proposed Section BB	1:100, 1:1000@A1

Table 1.3 – Supplementary Statements

Document	Consultant
Air Quality Assessment	Syntegra Group
Archaeological Desk Based Assessment	Archaeological Building Recording Services
Circular Economy Statement	Iceni Projects

Document	Consultant
Daylight, Sunlight and Overshadowing Assessment	Hawkins Environmental
Daylight Assessment Drawings	Hawkins Environmental
Design & Access Statement (incl. Urban Greening Factor)	Ackroyd Lowrie
Environmental Noise Impact Assessment	ES Acoustics
Fire Statement	BB7
Flood Risk Assessment	Cole Easdon
Landscape and Planting Concept	Anna French Associates
Phase 1 Investigation and Preliminary Risk Assessment	Remada Ltd
Preliminary Ecological Appraisal	Arbtech
Sustainability, Energy and Overheating Statement	Iceni Projects
Transport Assessment (incl. Refuse Strategy and Tracking)	Cole Easdon
Travel Plan	Cole Easdon
Tree Protection Plan	Canopy Consultancy
Arboricultural Impact Assessment and Method Statement	Canopy Consultancy
Whole Carbon Lifecycle Assessment	Iceni Projects

- 1.4 This statement provides a description of the application site and the surrounding area and comments on the sites planning history in Chapter 2. Chapter 3 provides an overview of the public consultation and engagement that has taken place with the local community, and Chapter 4 gives a summary of the development proposals. Chapter 5 details the relevant planning policy. Chapter 6 sets out the Sequential Test and Chapter 7 provides a planning and design assessment. Chapter 8 draws together the concluding thoughts.

2.0 THE SITE AND SURROUNDINGS

- 2.1 The application site is situated on the corner of Bath Road and High Street Harlington and comprises a four-storey circular hotel and car park. There are a number of garages found at the northern boundary of the site, including an external structure which has been used as a car wash for recent months. The primary hotel was originally built in the 1960's to serve Heathrow Airport and includes a courtyard at the centre. There are two vehicular access points; one situated off High Street Harlington and one off Bath Road.
- 2.2 The site is adjacent to residential properties to the north, including those located along Marlborough Crescent on the northern boundary which comprise of 4 storey residential blocks. Directly adjacent to the site on the eastern boundary is the newly built part 5, part 7 storey Marriot Hotel. To the south of the site, commercial properties can be found on the opposite side of Bath Road and Heathrow Airport is located in close proximity.
- 2.3 With a PTAL rating of 5, the site is well served by public transport including a bus stop directly outside the hotel (Holiday Inn Heathrow Ariel) providing regular services towards Cranford. Heathrow Airport is directly opposite the existing hotel which is where most of the existing customers originate from as either travelling or working.
- 2.4 The building is not statutory listed, nor is it located within a conservation area. In addition, there are no trees on site which are subject of a Tree Preservation Order.
- 2.5 The site itself is located within Flood Zone 1, and therefore is at the lowest risk of flooding.
- 2.6 On review of Hillingdon's Local Plan Policies Map, the site is located within the Heathrow Opportunity Area allocation, as well as Heathrow Archaeological Priority Zone. The site also forms part of Hillingdon's Air Quality Management Area, with the front part being situated within the A4 Corridor Air Quality Focus Area and the rear part found in Harlington Air Quality Focus Area.

Planning History

- 2.7 From an inspection of the Council's online records, we are aware of the following most recent planning history for the site:
- LPA ref: - 1126/AW/91/0738– Installation of automatic car park barriers with ticket machines onto the A4 Bath Road and Harlington High Street access points. Refused 3rd July 1991.
 - LPA ref - 1126/AS/89/2462- Installation of three satellite dishes on roof of hotel. Withdrawn.

- LPA ref: - 1126/APP/2006/1063 – Installation of Air Conditioning Condenser Units at Ground Floor Level. Approved 31st May 2006.
- LPA ref: 1126/ADV/2009/69 - Installation of 2 internally illuminated post signs, 2 internally illuminated logo signs and 1 internally illuminated canopy sign with associated external lighting. Approved 30th November 2009.

2.8 There are no further planning applications available online.

Pre-application Advice Request

2.9 Prior to formalising this submission, Officers at Hillingdon Council were engaged at Pre-Application stage regarding the potential redevelopment of the site.

2.10 A formal request for Pre-application advice was made on 21st October 2022 to discuss proposals which were split into two parts:

1. Hotel extension comprising an additional two storeys above the existing hotel building, providing 129 new hotel rooms; and
2. A new Apart Hotel comprising 88 new rooms and 9 x residential dwellings within a newly constructed part 6 / part 7 storey building.

2.11 A pre-application meeting was held via MS Teams on 1 December 2022 with the following people in attendance:

- Richard Phillips (RP - Case Officer)
- Mandip Malhotra (MM- Strategic and Major Applications Manager)
- Tom Campbell (TC - Planning Policy Team Leader)
- Mark Butler – (MB- Principal Conservation Officer)
- Alan Tilly (AT - Highways Officer)
- Oliver Lowrie (OL – Ackroyd Lowrie)
- Andrew Bonner (AB – Ackroyd Lowrie)
- Danielle St Pierre (DSP – Hybrid Planning & Development)
- Hannah Fawdon – (HF - Hybrid Planning & Development)
- Anna Mackay (AM - Hybrid Planning & Development)
- Rohit Lakhanpaul (Applicant)

2.12 Following the pre-application meeting, a new set of drawings were submitted to the Council on 4th January 2023 which were then formally reviewed in advance of issuing the Case Officer's written advice. The revised drawings outlined two options for the apart-hotel building. The first option showed a standalone building at the rear of the hotel which is more scaled

back than the original scheme and the second option shows a 'lollipop' extension to the existing hotel. The scaled back version has been incorporated into this application.

2.13 In summary, the Officers' feedback received on 12th April 2023 included the following:

Principle of Development – New Hotel Accommodation

- It is concluded that a Sequential Test would be required for any forthcoming planning application – “the roof extension and new building are individually of such an extent that it could reasonably be accommodated on a new site within or on the edge of a town centre location, as required by national, regional and local policy”.
- If the Sequential Test is passed, the site is considered to be sufficiently sustainable.
- The new hotel rooms within the existing hotel building are considered to be an acceptable size.
- The sizes of the new hotel units in the additional building have been reduced since the pre-app meeting, but there is still a concern that the new hotel units in the new building are too big (and the case officer is worried they may be used for longer than the 90-day period, which would mean they would be deemed as residential (Use Class C3 instead of Use Class C1)).
 - Therefore, the units should be reduced in size – more towards 28 sqm and remove reference to studios in the DAS.
 - A condition would be attached to any forthcoming planning application to the length of the occupancy.

Scale, Massing and Design

- There is no objection to the two storey roof top extension to the hotel – subject to airport safeguarding comments.
- The proposed additional building should be a maximum height of 4 storeys, and should be stepped back from the boundary – *the scheme is now 4 storeys in height*.
- A dark grey band is recommended to be added to the top of the extension.
- The design intent is broadly accepted – tying the two buildings together.
- Colonnade along Marlborough Crescent to be removed.
- A minimum of 21 metres separation distance between habitable rooms needs to be adhered to – *the windows have been designed so that no overlooking is possible*.
- 9% of new hotel accommodation should be fully accessible (and a parking space is required for every accessible hotel room).

Site Layout

Option 1 – Separate Buildings

- Option 1 creates a space between the existing hotel and proposed building; we would need to prove there is sufficient space for mature trees and also that there would be no overshadowing
- Replacement trees along Marlborough Crescent would need to be considered
- We'd need to consider the relationship between the new building and the back of the hotel which could be seen as 'inactive'/blank.

Option 2 – Connected Buildings

- The new building would benefit from the facilities within the existing hotel (incl. the central garden space/ courtyard) as they would be connected.
- The comments suggest that the connection and location of the new building in the north east corner of the site would not be visually symmetrical and would "impact the visual primacy and integrity of the original building". The space between the existing hotel and new building would likely be dark and uninviting due to the orientation of surrounding buildings – *the shared surface and larger gap between the existing building and new building has helped mitigate the Council's concerns from pre-app.*

2.14 Other enhancements are suggested as follows and have been incorporated into the design:

- Increased tree planting;
- Higher quality boundary treatment;
- Concrete bollards to be removed; and
- Increased area of green either side of Bath Road.

2.15 Subsequently, several changes were made to the scheme, including the reduction of the height of the apart-hotel building from 5/6 storeys in height to 4 storeys. There are no residential dwellings proposed as part of the development. A high-quality landscaping scheme is proposed, as well as increased tree planting to soften the feel of the site. The final development proposals are discussed in greater detail in the following section of this Statement.

3.0 COMMUNITY ENGAGEMENT

Public Consultation

- 3.1 An in-person public consultation was held on the 5 July 2023 at Ariel Hotel, within one of the hotel's conference rooms. The event was held between 2pm – 8pm where consultation boards were setup to provide local residents and businesses with further information on the proposals.
- 3.2 There were circa 10 people in attendance throughout the event, including local residents, staff from the nearby hotels, staff members from the existing hotel and potential hotel providers.
- 3.3 A summary of the feedback received is set out in Table 4.1.

Table 4.1 – Public Consultation Feedback

Element	Feedback	Response
Proposed Height	A local resident queried whether the additional storeys will be visible from their home.	It was concluded that their home was sufficiently far away so the proposed additional height would have no impact on their views.
Impact to Neighbouring Properties	Locals along Marlborough Crescent Concern regarding daylight/sunlight impact and overlooking.	A daylight/sunlight report has been prepared and is discussed in more detail within the Planning Assessment section of this document.
Parking	Are there sufficient car parking spaces provided?	<p>The proposal includes 57 no. car parking spaces on the site, representing a reduction of 61 spaces compared to the current 118 spaces available. 12 car parking spaces will feature active electric charging points. Additionally, 6 car parking spaces will be designated specifically for staff.</p> <p>It is concluded within the Transport Assessment that the redevelopment will contribute to 'Vision Zero' by proposing a reduction in the number of</p>

Element	Feedback	Response
		car parking bays when compared to the existing use.
Happy with the proposals in general, including the enhancements to the facades	The comments are noted.	N/A

4.0 THE PROPOSED DEVELOPMENT

4.1 The applicant seeks full planning permission for:

“Reconfiguration, alteration and extension of existing hotel (providing additional hotel rooms), together with erection of a new apart-hotel building on car park land to the north.”

4.2 The proposal comprises two distinct elements; the upwards extension of the existing hotel providing new hotel rooms and a newly proposed building towards the north of the site, providing new apart-hotel rooms, which are described in more detail below. The proposal also comprises an enhancement of the existing hotel’s façade.

Hotel Extension

4.3 It is proposed to extend the existing hotel with an additional two storeys which will be recessed and in keeping with the centric ring layout. The proposals will retain the existing hotel building and enhance the original design of the 1960s by replacing the cladding with a new material to improve the visual appearance/ refresh the façade of the hotel. The design of the new extension will match the existing form and ‘donut’ shape. The extension will be set back from the existing building. In total, there are 113 new hotel rooms proposed as part of the extension and reconfiguration at ground floor level.

4.4 We understand that the storage rooms at the rear of the hotel are not utilised/required, and the proposals seek to replace them with 12 new hotel rooms. Access will be provided from an enclosed corridor from the reception of the hall on the ground floor.

4.5 The existing first, second and third floors of the hotel will remain largely unchanged with the exception of a new evacuation lift and refuge space in each of the stair cores to accord with current building and fire regulations.

4.6 The new floors at the fourth and fifth level provide 101 new hotel rooms, which will be accessed from the main core, as shown on the proposed typical floor plan. The proposals include 2 x new accessible hotel rooms (meeting Building Regulation requirements).

4.7 A new courtyard is proposed at ground floor level, which will be located at the centre of the hotel, providing a new amenity space for guests/visitors. Another communal amenity space is proposed on first floor level, with a detailed landscape plan provided as part of this submission.

4.8 The existing car park area contains a total of 118 car parking spaces and the proposals will retain 57 car parking spaces, including 3 disabled car parking spaces and 2 enlarged spaces. 12 car parking spaces will benefit from active electric vehicle charging points. It is envisaged

that 6 no. of car parking spaces will be allocated specifically for staff, although they will be encouraged to travel to/from the site via sustainable modes of transport.

- 4.9 The existing bin and servicing area is located on the east side of the building, at ground floor level. Servicing is envisioned to remain as existing, albeit with a new refuse storage area at the rear of the hotel, providing a 26.8 m³ bulk waste container.

New Apart-Hotel Rooms

- 4.10 The proposed development also seeks to construct a new 4-storey building containing 98 new apart-hotel rooms (Sui Generis).
- 4.11 The proposed building is located at the northern part of the site, replacing some of the existing car parking area. The apart-hotel building includes a concierge service, reception and laundry/pantry rooms. Each self-contained apart-hotel room comprises its own kitchen facility.
- 4.12 The height matches the existing Ariel Hotel building and steps back to correspond with the neighbouring buildings.

Proposed Development Summary

- 4.13 The proposed is described in full in the accompanying Design and Access Statement, and is shown in detail on the submitted drawings, as well as being summarised below.

Hotel Ground Floor

- Existing reception /lobby areas, meeting rooms, office and store rooms;
- Existing restaurant and associated kitchen;
- Proposed restaurant extension into the centre of the hotel;
- Additional function room and outdoor amenity space, including a thoroughfare providing access from the reception area through the centre of the building towards to the new apart-hotel building;
- 12 x new hotel rooms;
- 57 car parking spaces, including 3 blue badge spaces and 2 enlarged car parking spaces;
- 12 electric vehicle charging points;
- 20 long-stay cycle parking spaces and 8 short-stay cycle parking spaces;
- Servicing bay located adjacent to the northern building; and
- Proposed boundary planting and new landscaping treatment, as per the proposed Landscape and Planting Concept plan.

Hotel First – Third Floor

- Existing 62 hotel rooms on each floor;
- 3 x existing stair cores and newly proposed refuge areas;
- Guest Lift and a newly proposed evacuation lift; and
- Amenity space for future guests (terrace on the first floor level).

Hotel Fourth Floor (Upwards Extension)

- 51 x new hotel rooms
- 3 stair cores, including refuge areas;
- 3 x lifts – passenger, evacuation and evacuation/service lift

Hotel Fifth Floor (Upwards Extension)

- 50 x new hotel rooms;
- 3 stair cores, including refuge areas;
- 3 x lifts – passenger, evacuation and evacuation/service lift

Apart-hotel Building

- Proposed 4-storey apart-hotel building, including a reception area, plant, laundry and pantry rooms; and
- 98 new apart-hotel rooms.

5.0 PLANNING POLICY & GUIDANCE

National Planning Policy Framework (2023)

- 5.1 The National Planning Policy Framework (NPPF) (September 2023) sets out the Government's planning policies for sustainable development and positive growth. The Framework prescribes a 'presumption in favour' of sustainable development (Paragraph 11) and supports proposals that are in accordance with the policies of an up-to-date development plan.
- 5.2 To achieve sustainable development, the following economic, social and environmental objectives need to be pursued in mutually supportive ways (Paragraph 8), and should be delivered through the preparation and implementation of plans and the application of the policies in the Framework; however, they are not criteria against which every decision can or should be judged (Paragraph 9):
- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health social and cultural well-being; and
 - **an environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.3 Paragraph 9 of the NPPF continues by stating that planning decisions should play an active role in guiding development towards sustainable development solutions, but in so doing, should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 5.4 The NPPF states at Paragraph 80 that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. 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.

- 5.5 Paragraph 86 states that planning policies define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

- 5.6 Paragraph 87 of the NPPF (2023) 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 main town centre uses within the Glossary.

- 5.7 The NPPF states at Paragraph 105 that development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. In assessing sites that may be allocated for development in plans, or specific applications for development (Paragraph 110), it should be ensured that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. Development should only be refused on highways grounds if there would be an unacceptable impact on highways safety, or the residual cumulative impacts on the road network would be severe (Paragraph 111).

- 5.8 Paragraph 119 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land.

- 5.9 Paragraph 124 states that the delivery of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

- 5.10 To achieve well-designed places, Paragraph 127 of the NPPF states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities). Where the design of a development accords with clear expectations in plan policies.

- 5.11 Planning policies and decisions should ensure that developments will function well and add to the overall quality of an area, are visually attractive and sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to

accommodate and sustain an appropriate mix of development and support local facilities and transport networks, and create places that are safe, inclusive and accessible which promote health and well-being, with a high standard of amenity for existing and future users (Paragraph 130).

- 5.12 In determining applications (Paragraph 134), significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

London Plan (2021)

- 5.13 In March 2021, the Mayor's Spatial Development Strategy for London, known as 'The London Plan', was adopted and provides the overall strategic plan for London, setting out an integrated economic, environmental, transport, and social framework for the development of London over the next 20-25 years. The following policies from the new London Plan are considered relevant to the proposals:
- 5.14 Policy SD1 'Opportunity Areas' requires development proposals to support the regeneration and growth of Opportunity Areas.
- 5.15 Policy SD6 'Town centres and high streets' requires development proposals to promote and enhance town centres and high streets. London's varied town centres should be promoted 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, night-time economy, civic, community and social uses. Development should ensure town centres are the primary locations for commercial activity beyond the CAZ and important contributors to the local as well as London-wide economy. Tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, should be enhanced and promoted.
- 5.16 Policy SD7 'Town centres: development principles and Development' encourages boroughs to take a town centres first approach, discouraging out-of-centre development of main town centre uses. A sequential test should be applied to applications for main town centre uses requiring them to be located in town centres. If no suitable town centre sites are available or expected to become available within a reasonable period, consideration should be given to sites on the edge-of-centres that are, or can be, well integrated with the existing centre, local walking and cycle networks, and public transport. Out-of-centre sites should only be considered if it is demonstrated that no suitable sites are (or are expected to become) available within town centre or edge of centre locations.

- 5.17 Policy D2 'Infrastructure requirements for sustainable densities' encourages development proposals to consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services.

- 5.18 Policy D3 'Optimising site capacity through the design-led approach' encourages all development to 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. Development 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 existing and emerging street hierarchy, building types, forms and proportions. Proposals should also deliver appropriate outlook, privacy and amenity, as well as provide outdoor environments that are comfortable and inviting for people to use.

- 5.19 Policy D4 'Delivering good design' states that Design and Access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. The design quality of development should be retained by avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition.

- 5.20 Policy D5 'Inclusive design' requires development proposals to achieve the highest standards of accessible and inclusive design. Development should be convenient and welcoming with no disabling barriers and should be able to be entered, used and exited safely, easily and with dignity for all.

- 5.21 Policy D8 'Public realm' sets out a criteria requiring development proposals to comply with to provide new well-designed, safe, accessible, inclusive, attractive, well-connected public realm where appropriate.

- 5.22 Policy D9 'Tall buildings' requires development proposals should address a criterion in relation to visual impacts, functional impacts, environmental impacts and cumulative impacts.

- 5.23 Policy D11 'Safety, security and resilience to emergency' states that development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime.

- 5.24 Policy D12 'Fire safety' ensures the safety of all building users and requires all development proposals to achieve the highest standards of fire safety. Appropriate fire alarm systems and

passive/active fire safety measures should be incorporated into the design. All major development proposals should be submitted with a Fire Statement.

- 5.25 Policy D13 'Agent of change' states new noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.
- 5.26 Policy D14 'Noise' residential and other non-aviation development proposals are required to reduce, manage and mitigate noise to improve health and quality of life.
- 5.27 Policy E10 'Visitor infrastructure' encourages London's visitor economy by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.
- 5.28 Policy E11 'Skills and opportunities for all' encourages development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.
- 5.29 Policy G5 'Urban greening' confirms that all major developments should contribute to the greening of London by incorporating high quality landscaping, green roofs and wall where possible.
- 5.30 Policy G7 'Trees and woodlands' states that wherever possible existing trees of value are retained. The planting of additional trees should generally be included in new developments.
- 5.31 Policy SI1 'Improving air quality' requires development proposals to tackle poor air quality, protect health and meet legal obligations.
- 5.32 Policy SI2 'Minimising greenhouse gas emissions' seeks for all major developments to be net carbon zero by following the energy hierarchy. A minimum reduction of 35% beyond Building Regulations is required on site.
- 5.33 Policy SI3 'Energy infrastructure' encourages major development within Heat Network Priority Areas should have a communal low-temperature heating system.
- 5.34 Policy SI4 'Managing heat risk' confirms major developments should demonstrate how they will reduce the potential for internal overheating and reliance on air con systems within a energy statement.

- 5.35 Policy SI5 'Water infrastructure' encourages development proposals to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided.

- 5.36 Policy SI7 'Reducing waste and supporting the circular economy' sets out that adequate, flexible and accessible storage space and collection systems must be included within development and at a minimum separate recycling should be provided.

- 5.37 Policy SI13 'Sustainable drainage' requires development proposals to aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible with the preference for green over grey features, in line with the outlined drainage hierarchy.

- 5.38 Policy T3 'Transport capacity, connectivity and safeguarding' requires development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.

- 5.39 Policy T4 'Assessing and mitigating transport impacts' notes that development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. And that transport assessments/statements should be submitted with development 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.

- 5.40 Policy T5 'Cycling' states that development proposals should support the delivery of cycle routs and secure the provision of appropriate levels of cycle parking.

- 5.41 Policy T6 'Car parking' notes that 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 development has no general parking but should still provide disabled persons parking in line with Part E of this policy.

- 5.42 Policy T6.4 'Hotel and leisure use parking' states 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. In addition, all operational parking must provide infrastructure for electric or other UltraLow Emission vehicles, including active charging points for all taxi spaces.

- 5.43 Policy T6.5 'Non-residential disabled persons parking' states for hotel and leisure uses should have 6% of total parking provision should be designated disabled bays while 4% of total

parking provision should be enlarged bays. In addition, the policy sets a criterion for setting disabled bay standards.

- 5.44 Policy T7 'Deliveries, servicing and construction' states development proposals should facilitate sustainable freight movement by rail, waterways and road.

Local Planning Policy

- 5.45 The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

- The Local Plan: Part 1 – Strategic Policies (2012);
- The Local Plan: Part 2 – Development Management Policies (2020); and
- The Local Plan: Part 2 – Site Allocations and Designations (2020).

The Local Plan: Part 1 – Strategic Policies

- 5.46 Policy E3 'Strategy for Heathrow Opportunity Area' seeks to manage development and protect land within the Heathrow Airport boundaries for airport-related activities, to ensure that local people benefit from sustainable economic growth.
- 5.47 Policy E7 'Raising Skills' ensures a range of training and employment opportunities are linked with the development of major sites for both construction phases and end use occupiers, and through liaising with local colleges and businesses to ensure workforce development initiatives and training programmes reflect skill requirements in the workplace.
- 5.48 Policy BE 1 'Built Environment' requires all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs for all residents.
- 5.49 Policy EM1 'Climate Change Adaptation and Mitigation' ensure that climate change mitigation is addressed at every stage of the development process.
- 5.50 Policy EM6 'Flood Risk Management' requires new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).
- 5.51 Policy EM8 'Land, Water, Air and Noise' seeks to safeguard and improve all water quality, not cause deterioration in the local air local, promote maximum possible reduction in noise levels and provide mitigation strategies that reduce the impact of contaminated land on surrounding land uses.

- 5.52 Policy T4 'Heathrow Airport' requires development proposals to support the sustainable operation of Heathrow within its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.

The Local Plan: Part 2 – Development Management Policies

- 5.53 Policy DME 5 'Hotels and Visitor Accommodation' supports a range of visitor accommodation, conference and related uses in accessible sustainable locations.
- 5.54 Policy DME 6 'Accessible Hotels and Visitor Accommodation' ensures that inclusive access has been incorporated into the proposal from the onset.
- 5.55 Policy DMTC 1 'Town Centre Development' states proposals for 'main town centre uses' in out of centre locations will only be permitted where there is no harm to residential amenity. It also requires proposals for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach.
- 5.56 Policy DMHB 7 'Archaeological Priority Areas and Archaeological Priority Zones' seeks to ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works.
- 5.57 Policy DMHB 10 'High Buildings and Structures' requires any proposal for a high building or structure to respond to the local context and satisfy a set criterion.
- 5.58 Policy DMHB 11 'Design of New Development' states that all development will be required to be designed to the highest standards and incorporate principles of good design.
- 5.59 Policy DMHB 12 'Streets and Public Realm' requires all development to be well integrated with the surrounding area and be accessible.
- 5.60 Policy DMHB 14 'Trees and Landscaping' states that all development will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features.

- 5.61 Policy DMHB 15 'Planning for Safer Places' requires all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.

- 5.62 Policy DMEI 1 'Living Walls and Roofs and Onsite Vegetation' requires all major development to incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided and major developments in Air Quality Management Areas must provide onsite provision of living roofs and/or walls.

- 5.63 Policy DMEI2 'Reducing Carbon Emissions' requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved. Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.

- 5.64 Policy DMEI 3 'Decentralised Energy' requires major developments to connect to a Decentralised Energy Network (DEN). If they are close to an existing DEN (500 meters) or a planned one (likely operational within 3 years), they must connect, contribute to connection costs, and commit to connecting, unless infeasible. The Council supports DENs but with adherence to design and air quality policies.

- 5.65 Policy DMEI 10 'Water Management, Efficiency and Quality' requires applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.

- 5.66 Policy DMEI 12 'Development of Land Affected by Contamination' states proposals for potentially contaminated sites must include an initial contamination study. Planning permission may be granted if contamination is assessed and safely remediated for the proposed use. Conditions ensure remedial work is done before development begins. Harmful contamination levels demand further investigations and remediation proposals.

- 5.67 Policy DMEI 14 'Air Quality' requires development proposals to demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.

- 5.68 Policy DMCI 7 'Planning Obligations and Community Infrastructure Levy' ensures development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it.

- 5.69 Policy DMT 1 'Managing Transport Impacts' states development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds.

- 5.70 Policy DMT 2 'Highways Impacts' require development proposals to adhere to several guidelines: ensuring safe access to the highway network, preventing harm to air quality and local amenities, accommodating cyclists and pedestrians, minimizing congestion, and implementing mitigation measures where necessary.

- 5.71 Policy DMT 4 'Public Transport' encourages proposals to enhance public transport facilities, requiring developers to improve local services, such as accessibility, bus stops, priority measures, cycling infrastructure, and more, based on transport assessments and travel plans, integrated into the project's design where necessary.

- 5.72 Policy DMT 5 'Pedestrians and Cyclists' requires all development safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting to the wider network.

- 5.73 Policy DMT 6 'Vehicle Parking' states that development proposals must comply with the Councils parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

- 5.74 Policy DMAV 1 'Safe Operation of Airports' supports safe airport operations at Heathrow and RAF Northolt. It will work with the airport operator to safeguard these areas, prevent developments that pose aircraft hazards, and ensure sensitive uses like housing and schools near airports have appropriate noise mitigation.

6.0 SEQUENTIAL TEST

- 6.1 This Sequential Assessment has been prepared in support of an application for planning permission for an extension to the existing hotel at Ariel Hotel on Bath Road.
- 6.2 It follows a pre-application advice request and a pre-application meeting held in December 2022. The formal pre-application written response advised that a sequential test should be applied to planning applications for main town centre uses which are not proposed in an existing centre.
- 6.3 As the application site is located “out-of-centre”, this section of the Planning Statement provides an assessment of sequentially preferable sites in accordance with national and local planning policy. Whilst the site is located within the Heathrow Opportunity Area, London Plan Policies E10 and SD7 still require a sequential approach.
- 6.4 The proposal comprises an uplift in the number of hotel rooms and will continue to be managed by the existing hotel provider. Notably, the apart-hotel rooms (Sui Generis) will also be managed by the existing hotel provider, as the new building will essentially be an extension of the current hotel provision, but the apart-hotel rooms are designed to be self-contained with their own kitchen facilities. It is crucial that the newly proposed hotel rooms are located on the site (as part of an upwards extension of the existing hotel building) and that the apart-hotel rooms are also provided on site to ensure that the management of the buildings can be kept under the same control and management.
- 6.5 Although it is noted within the Council’s pre-application written response that the upwards extension would result in an uplift in hotel rooms which could ‘reasonably be accommodated on a new site within or on the edge of a town centre location’, it should be emphasised here that the applicant’s hotel provider will be managing the site as a whole and as such, the new hotel rooms would not realistically be accommodated on a different site in a town centre location.
- 6.6 Although the proposal is not within a town centre location, the proposed additional hotel and apart-hotel rooms will promote the area’s long-term vitality and viability by allowing it to grow and diversify in a way that can respond to the increased demand in hotel rooms, as well as Heathrow’s expansion.
- 6.7 Notwithstanding the above, the following areas have been reviewed, based on a recent Sequential Test that was prepared on a nearby site (Heathrow Marriott Hotel, Bath Road, Hayes UB3 5AN). It was considered that the areas below would also be relevant to Ariel Hotel’s search for sites. A detailed site review found at **Appendix 2**.

- Staines (secondary regional centre, Spelthorne BC & Runnymede BC)
- Hounslow (metropolitan centre, LB Hounslow)
- Feltham (major centre, LB Hounslow)
- West Drayton (town centre, LB Hillingdon)
- Hayes (town centre, LB Hillingdon)
- Southall (major town centre, LB Ealing)

- 6.8 The approach to selecting sites has been based on a nearby hotel site, as mentioned above. As the upwards extension is to be placed above the existing hotel and would only be feasible managed by the existing provider and current staff, the consideration of operational and market requirements has not been carried out for this assessment as it was not deemed necessary.
- 6.9 A sequential test should be proportionate and appropriate for the given proposal. The area of each site reviewed in Appendix 2 is given, as well as distance from the centre and the existing use. The planning constraints are also listed out.
- 6.10 The site area is 8,020 sqm (86,326.56 sqft) and comprises of an existing hotel. The application site will be able to accommodate an additional 113 hotel rooms and 98 apart-hotel rooms, including associated car parking spaces. There are no sites listed out in Appendix 2 that are sufficient in size to match the existing site.
- 6.11 Based on the arguments made above, it is felt that an alternative site in a town centre location would not be realistic for the purposes of the existing hotel provider. It will not be possible to manage each element of the proposals on different sites due to the interlinked nature of the operation.
- 6.12 It is concluded that there are no sequentially preferable sites identified by the Assessment, and the test is therefore passed. The application site is the most suitable location for the expansion of the existing hotel and the newly proposed apart-hotel building. The two new elements will be managed by the existing hotel operator and therefore the application site is the most feasible and realistic option, instead of a town centre location.

7.0 PLANNING ASSESSMENT

- 7.1 This section of the report seeks to address the key planning issues arising from the proposed development. These issues have been identified through pre-application discussions with the Council and a review of the relevant national, regional and local planning policy for the site.

Principle of Development

- 7.2 Consistent with Paragraphs 119 and 120 of the NPPF (2023), the proposals seek to maximise the development potential of this underutilised site, in order to provide additional hotel rooms and apart-hotel rooms. Through the additional two storeys on the existing building and a proposed apart-hotel building on the northern boundary of the site, the scheme will provide further accommodation to meet the demands of the borough and nearby Heathrow Airport.
- 7.3 The principle of hotel use has already been established on the site. Notwithstanding, the application site is situated within a highly accessible location and would provide an additional 113 hotel rooms to the existing building and 98 apart-hotel rooms. Given the site is located in a PTAL 5 rating area, the proposal aligns with the Development Plan policies DME 5 and E10 as the Council encourage hotels to be located in sustainable locations which are well-connected by public transport.
- 7.4 In addition, it is understood that Hillingdon has the third highest projected net demand for hotel rooms, including 4,947 rooms (8.5% of London's total share). The site's proximity to Heathrow Airport is also a key consideration, as well as Heathrow Airport's Northwest Runway expansion. As such, there is a clear demand for new tourist accommodation, in the form of hotel rooms and apart-hotel units in this location.
- 7.5 In light of the above, the proposal represents an entirely deliverable, sustainable, and suitable development that will utilise previously developed land, which is in accordance with the character and established mix of uses in the surrounding area. The development is considered entirely consistent with the NPPF, London Plan, and Local Plan Policy

Urban Design

- 7.6 The proposal has been designed to be of the highest standards and incorporate principles of good design and ensuring high quality building materials and finishes.
- 7.7 The extension to the current hotel building seeks to refurbish and restore the authentic 1960s design of the facades. The plan involves adding two additional stories to the existing building while preserving its current shape. This approach ensures that the development respects the

surrounding street environment by stepping back from the original building outline, preventing an overbearing presence.

- 7.8 Furthermore, the proposal includes essential enhancements to refurbish the building, particularly addressing the outdated cladding. This outdated cladding will be replaced with a combination of white, dark grey, and black materials, aligning more closely with the original architectural design from the 1960s.
- 7.9 The design of the apart-hotel is meticulously crafted to align with the requirements for obtaining planning permission. It incorporates several key elements to ensure its success in this regard.
- 7.10 The architectural design pays careful attention to the existing urban context, harmonising with the surrounding built environment while introducing contemporary features that enhance its visual appeal.
- 7.11 The design also caters to essential amenities, such as cycle storage, refuse facilities, and communal spaces, to enhance the living experience for future guests.
- 7.12 A Landscaping Strategy has been prepared by Anna French Associates. This strategy focuses on enhancing the green elements along the boundaries facing Bath Road and High Street Harlington. This will involve the introduction of new trees, planting, and shrubs to create a more verdant environment.
- 7.13 Additionally, the first-floor courtyard will be transformed into a cozy seating area. This transformation will combine various hardscape elements with planters to create a softened atmosphere. It's designed to encourage guests to make the most of this outdoor space.
- 7.14 In line with London Plan Policy G5 'Urban greening', the proposed development provides an urban greening factor of 0.3. The Design and Access Statement provides full details of this calculation.
- 7.15 As such, it is considered, in terms of design, that the proposal is in accordance with the NPPF (2023), Policies D3 and D4 of the London Plan (2021) and Policies DHMB11, DHMB15 of the Local Plan.

Guest & Neighbouring Amenity

- 7.16 The NPPF states that planning decisions should ensure that developments create places that are safe, inclusive, and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future uses.

- 7.17 Accordingly, Policy DMTC 1 of the Local Plan requires new development to consider the impacts of development on the amenity of existing and future occupiers. Matters such as access to daylight/sunlight, over-looking and privacy and noise are all material considerations.
- 7.18 The scheme meticulously considered daylight and sunlight conditions to ensure optimal natural lighting within the development while minimising overshadowing of neighbouring properties. A Daylight and Sunlight Report (DSR) has been prepared by Hawkins Environmental and has been submitted to support the application and analyses the potential impact of a development on the daylight, sunlight and overshadowing on the surrounding properties.
- 7.19 The accompanying DSR reveals that out of the 108 windows evaluated, 11 of them do not fully meet the recommendations outlined in the BRE Report. These 11 windows would experience a slight decrease in daylight, falling below 27% VSC and less than 0.8 times the existing level. While this reduction may be noticeable, it's important to note that these deviations from BRE Guidance are minimal and fall within the tolerances specified in the GLA's Hearing Report guidelines for London and urban areas. Consequently, this slight impact is deemed acceptable, especially considering the development's urban location. As a result, the assessment concludes that sunlight and daylight should not pose a constraint to the development.
- 7.20 In terms of outlook and privacy, the layout of the proposed development has been carefully configured on the site to direct activity and openings away from more sensitive uses such as the residential properties along Marlborough Crescent.
- 7.21 An Environmental Noise Assessment has also been prepared by ES Acoustics to support this application and details the required mitigation measures to ensure that the proposed residential accommodation will achieve the BS8233:2014 standards for accommodation. Aside from these measures, no further noise mitigation is required to make the development acceptable in noise terms.
- 7.22 As such, the proposed development will provide a suitable environment for future visitors and has been designed to effectively manage and mitigate any potential noise impacts in accordance with Policy DMTC 1 of the Local Plan and Policy D14 of the London Plan.
- 7.23 In addition, the proposed use will not adversely affect the amenity of neighbouring or future occupiers in terms of fumes, odour, littering, light pollution or microclimatic conditions, nor parking or manoeuvring of vehicles.

- 7.24 Likewise, and on the basis of the proposed mitigation measures outlined in the submitted Noise Assessment, the nearby existing businesses would not have unreasonable restrictions placed upon them as a result of the proposed development.
- 7.25 Overall, the proposal will not result in the loss of amenity to existing or future occupiers, nor to adjoining development, and is therefore considered to be wholly in accordance with Policy DMTC 1 of the Local Plan.

Transport, Highway Access, and Parking

- 7.26 A Transport Statement has been prepared by Cole Easdon and is submitted with the application. The Statement considers the traffic and transportation issues associated with the proposed development.
- 7.27 The site is located within a sustainable and highly accessible location (PTAL rating 5), which benefits from extensive pedestrian and cycle infrastructure with good access to the Town Centre. Sheltered bus stops are located within 50 metres (less than 1 minutes' walk) of the site in both directions on Bath Road and High Street Harlington, providing frequent services to local destinations while Hayes and Harlington Station (Elizabeth Line and Great Western Railway), is located 1.9 miles away to the north, providing connections to Central London, and beyond.
- 7.28 The site benefits from two current vehicular entry points. The first access point, located to the north-west of the Ariel Hotel building on A437 High Street Harlington, accommodates two-way traffic flow for entry and exit. The second access point, situated south of the Ariel Hotel building, is designated for inbound traffic entering the site. It is proposed that there will be a one-way system around the Hotel whereby vehicles are only permitted to traverse around the site in a clockwise direction as per the existing arrangement on the site.
- 7.29 The proposal includes 57 no. car parking spaces on the site, representing a reduction of 61 spaces compared to the current 118 spaces available. Out of these, 12 car parking spaces will feature active electric charging points. Additionally, 6 car parking spaces will be designated specifically for staff.
- 7.30 There will be a combined total of 28 bicycle parking spaces, with 20 designated for long-term use (for staff) and 8 for short-term use (for guests). The short-term bicycle parking spaces will be located outdoors near the main entrance of Ariel Hotel, while the long-term spaces will be situated to the northeast of Ariel Hotel within a dedicated cycle store.

- 7.31 A Travel Plan also accompanies this planning application (also prepared by Cole Easdon) which sets out measures to minimise the transportation impacts of the proposed development by seeking to restrain car usage, whilst simultaneously seeking to maximise the number of journeys made by walking, cycling, public transport and car sharing.
- 7.32 It is envisaged that refuse collections will be accommodated via a loading bay situated towards the north-eastern corner of the site, conveniently located next to the bulk waste store and pedestrian entrance leading to the stores in the north east of the Hotel.
- 7.33 In light of the above, the submitted Transport Statement concludes that there will be no detrimental impact on the local highway network by way of the proposed development. Indeed, the proposal will encourage more sustainable methods of transport and reduce the impact on the surrounding network. Therefore, the proposals are considered to be fully acceptable in relation to transport matters.

Energy and Sustainability

- 7.34 Measures have been included throughout the design to ensure that the development complies with all targets set out in Policies EM1 and DMEI2 of the Local Plan, and related guidance, in relation to climate change adaption, mitigation, and low energy design. A Sustainability, Energy and Overheating Report has been prepared by Iceni Projects, as well as a Circular Economy Report and a Whole Life Carbon Assessment.
- 7.35 The accompanying Sustainability and Energy Report prepared by Iceni Projects provides comprehensive details on the various measures incorporated into the development to reduce carbon emissions, energy demand and water usage.
- 7.36 Accordingly, a range of sustainable design features are proposed, and construction will be responsibly managed to ensure minimal impact on the environment and local community. By designing to rigorous energy standards and employing electric-only systems for space heating and cooling and hot water, within the proposed apart-hotel portion of the scheme. These measures combine to provide an approximate carbon dioxide emission saving of 90% compared to the Part L:2021 baseline and therefore complying the requirements of London Borough of Hillingdon and the Greater London Authority (GLA).
- 7.37 Furthermore, the electric-only systems in the apart-hotel portion ensure it is entirely free from fossil fuels, supporting the government's goal of achieving net-zero carbon emissions by 2050. Overall, the development follows the Energy Hierarchy methodology, achieving a 90% CO2 emissions reduction.

- 7.38 As a result, the proposals for the scheme are in line with the overarching principles of sustainable development and will fully comply with the relevant energy and sustainability policies within the London Borough of Hillingdon Local Plan Part 1: Strategic Policies and Part 2: Development Plan, and related guidance.

Environmental Considerations

Flood Risk and Drainage Strategy

- 7.39 A Flood Risk Assessment and Drainage Strategy has been undertaken by Cole Easdon. The Flood Risk Assessment and Drainage Strategy (FRADS), concludes the following:
- Flood risk from all sources is considered to be low. No mitigation is required.
 - The surface water drainage strategy for the site has been prepared according to the drainage discharge hierarchy set out in CIRIA C753 The SuDS Manual. There is insufficient space to incorporate infiltration-based drainage. Therefore, in accordance with the drainage hierarchy, an attenuation-based surface water drainage strategy, with disposal to the existing surface water sewer is proposed.
 - Post development surface water discharge will be restricted to a rate of 3.5 l/s. This provides more than betterment over the existing brownfield situation. On site attenuation will be provided within two cellular attenuation tank.
 - Water quality has been assessed in line with the Simple Index approach from Chapter 26 of CIRIA C753 The SuDS Manual. Runoff from roof areas is considered fairly uncontaminated, therefore the passage of water through proposed catchpits will provide adequate water quality treatment before entering the proposed cellular attenuation tank.
 - SuDS exceedance flows would follow the natural topography of the site and flow to the west or south of the site and enter the highway corridor. Once in the highway corridor flows would follow the topography of the highway without impacting upon the proposed or adjacent existing development.
 - The proposed cellular attenuation tank, catch pits and associated drainage network will be maintained by the site owner(s) or a private maintenance company acting on their behalf.
- 7.40 In compliance with the requirements of the NPPF (2023), Policy DME1 9 of the Local Plan, and subject to the conditions advised in the report, the FRADS concludes overall that the development can proceed without being subject to significant flood risk. Moreover, the development can be accommodated without increasing flood risk within the wider locality in accordance with the objectives set by central government, and the Environment Agency. The proposed development is therefore appropriate in flood risk terms.

Preliminary Contamination Risk Assessment

- 7.41 A Preliminary Contamination Risk Assessment has been prepared by Remada Ltd, in order to present pertinent information into the environmental risks and liabilities associated with the site.
- 7.42 The conclusions and recommendations from the assessment are summarised below:
- A conceptual model of the site was developed which demonstrates the potential for significant potential pollutant linkages and through the risk assessment it has not been possible to prove with the required degree of certainty that the site is uncontaminated for the proposed sensitive end use.
 - The desk study identified a number of on-site and off-site potential sources of contamination that would require further investigation. They include investigation of the lateral and vertical extent of made ground/fill beneath the proposed hotel extension footprint(s), collection of soil and groundwater samples from the areas identified above for contaminants of concern; and ground gas monitoring. This should be combined with a geotechnical assessment to determine the suitability of the site soils for the proposed structure.
 - Therefore, further work is required in order to confirm and characterise the presence or otherwise of contamination on site. This will take the form of an intrusive investigation and further generic or detailed risk assessment. If the pollutant linkages are confirmed as unacceptable then some form of remediation will be required. Should this be required, we believe that the level of remediation should be viable, being relatively simple and low key.
- 7.43 The report is based on the assumption by the author that the Local Planning Authority (LPA) will follow guidance detailed in the NPPF where for all development involving disturbance to land, the LPA would impose a condition requiring the reporting of all other instances of contamination currently unreported found during the course of development. Should instances of previously unreported contamination be found then the submission for approval of an assessment of the risks and proposed remediation scheme will be submitted to the LPA.
- 7.44 In light of the above, and subject to the mitigation measures set out in the Preliminary Contamination Risk Assessment, the proposed development is therefore entirely appropriate in terms of contamination and environmental management, having due regard to Policies DMEI 11 and DMEI 12 of the Local Plan.

Preliminary Ecological Appraisal / Roost Assessment

- 7.45 The application is supported by a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) prepared by Arbtech. The findings of the PEA and PRA and its conclusions are summarised below:
- No protected or non-native invasive plant species were identified on site.
 - No ecological constraints were identified for roosting bats or foraging and commuting bats. Two buildings located within the application site which was assessed as supporting 'Negligible' roosting suitability as no potential roost features were recorded with no identified access points.
 - No additional ecological surveys are required to support the proposed planning application.
 - The existing on-site trees and shrubs offer suitable nesting, foraging, and commuting options for birds, including common garden species. The proposed development is not expected to have any adverse effects on nesting birds, as no trees or shrubs will be removed. The installation of one bird boxes at the site will provide additional nesting habitat for birds.
- 7.46 In light of the above, it is anticipated that an appropriate lighting scheme (to minimise perceived light pollution for foraging and commuting bats), details of, and for the maintenance and management of the green roof, and further enhancements such as bat boxes can be secured through the imposition of appropriately worded planning conditions.
- 7.47 As such, it is considered that the proposal will deliver a significant betterment in the ecological and biodiversity value of the site over existing site conditions. Therefore, the proposals are considered to be entirely acceptable in accordance with Policy DME1 7 of the Local Plan.

8.0 SUMMARY AND CONCLUSIONS

8.1 This planning application has been submitted on behalf of R Heathrow Ariel Opco Ltd., and seeks full planning permission for:

“Reconfiguration, alteration and extension of existing hotel (providing additional hotel rooms), together with erection of a new apart-hotel building on car park land to the north.”

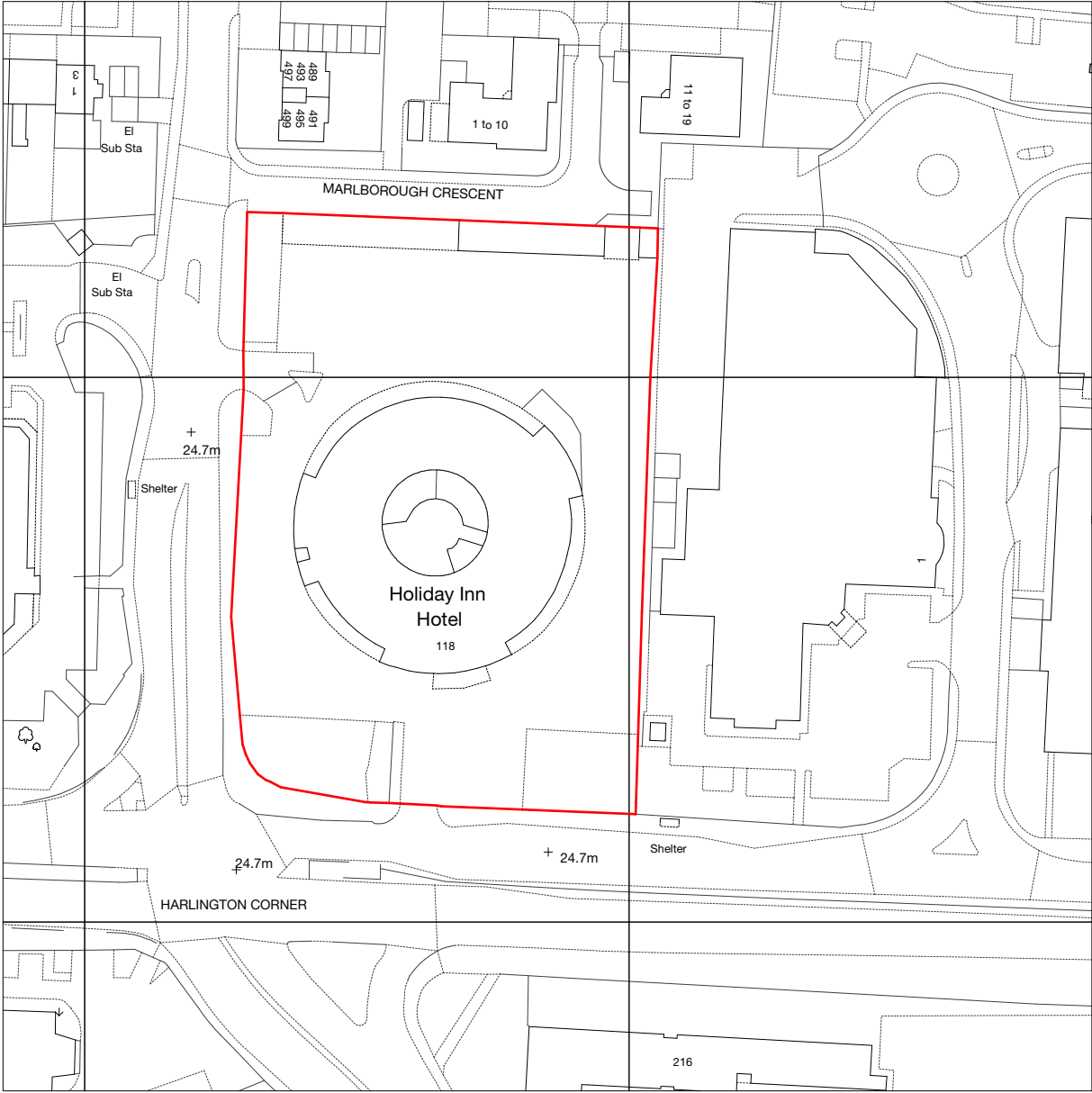
8.2 As such, the proposal accords with relevant National, London and Local planning policy and will:

- Provide additional, modern and accessible hotel rooms (Use Class C1);
- Create a new apart-hotel building (Sui Generis) which will contribute towards the Borough’s visitor accommodation;
- Create a high-quality, sympathetic and contemporary upwards extension and an improvement of the existing hotel façade;
- Be in a highly sustainable location with good transport links, and will not have a detrimental impact on the local highway network; and
- Not have a detrimental impact on neighbouring amenity.

8.3 In light of the above, it is our view that the proposal is wholly compliant with the NPPF (2023), The London Plan (2021) and Part 1 and Part 2 of the Hillingdon Local Plan, and therefore entirely appropriate in planning policy terms.

8.4 Accordingly, we look forward to receiving confirmation that the application has been registered and, subsequently, approved.

APPENDIX 1 – SITE LOCATION PLAN



APPENDIX 2 - SEQUENTIAL TEST SITE REVIEW

Staines – Secondary Regional Centre, Spelthorne BC & Runnymede BC

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
£340,000	20, High Street, Staines-upon-Thames, Surrey, TW18	500	110.69m	Retail property	-Sites and Areas of high archaeological potential -Sites and monuments of county archaeological importance

Hounslow – Metropolitan Centre, LB Hounslow

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
£1,750,000	44-52 High Street, Hounslow, Middlesex, TW3 1NW	n/a	1.1km	Mixed Use	-Mixed use -Key existing office locations -Archaeological priority areas
£525,000	32 Hanworth Road, Hounslow, GreaterLondon, TW3	1,086	429.79km	Hairdressers/ Salon	-Archaeological priority areas
£450,000	13 Bellview court, Hanworth Road, Hounslow TW3 3TQ	1012	345.81m	Commercial Property with a split level two bedroom and two bathrooms flat	No
£2100 (5-year lease)	248 Hanworth road, Hounslow, TW3 3TY	n/a	423.31m	Shop	-Areas of special character
£421,000	Unit 1, Worton court, Worton road, Isleworth, TW7 6ER	n/a	1.35km	Commercial property	-Locally significant industrial site
£355,000	Worton road	n/a	1.42km	Commercial property	-Locally significant industrial site

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
POA	82,84,84b Albion Road, TW3 3RS	n/a	896.17m	Shops and flats	No
£50,000	Marryat Close, Hounslow, Middlesex, TW4 5DQ	1985	1.04km	Land	No

Feltham – Major Centre, LB Hounslow

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
£2,600,000	Unit B pier Road, North Feltham trading estate, Feltham, TW14 0TW	8867	1.83km	Warehouse	-Preferred industrial locations -Advert special control areas

West Drayton – Town Centre, LB Hillingdon

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
£1,600,000	4 Admiralty Close, West Drayton, Middlesex, UB7 9NG	3,703	737.5m	Childcare facility	No
£2,450,000	Technology House, 215 High Street, West Drayton, UB7 7QP	5,918-12,939	417m	Industrial development	- Archaeological priority zones
£2,300,000	166 High Street, Uxbridge, West Drayton, UB7 7BE	n/a	151.99m	Three retail units	-Town centres - Archaeological priority zones

Hayes – Town Centre, LB Hillingdon

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
£200,000	109, Station Road, Hayes, Coldharbour Ln, Hayes UB3 3EF	276	685.47	Café and mini cab service	-Town centres - Archaeological priority zones
£25,000	Gothic court, Harlington, UB3 5DR	n/a	2.74km	Garage	-Conservation area

Southall – Major Town Centre, LB Ealing

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
£2,200,000	88 The Broadway, Southall, Middlesex, UB1	1,432	395.17m	High street retail property	No
POA	2-6 The Broadway, Southall, Middlesex, UB1	6,700	41.1m	15-bedroom mixed use property	- No planning constraints <u>222773CND</u> Details of noise separation pursuant to condition 8 of planning permission 202919FUL dated 27.04.2022 for 'Conversion of first floor and second floor into a House in Multiple Occupation (Large HMO) (Use Class Sui Generis) and associated external alterations involving the installation of a new staircase to the rear elevation and a first floor rear extension' Approved Tue 19 Jul 2022***
POA	2-6 The Broadway, Southall, Middlesex, UB1	3,098	41.1m	High street retail property	***
£6,000,000	4-6 The Broadway, Southall,	No. 4-6 Restaurant 213	39.85m	Large restaurant and five retail units	- No planning constraints

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
	Middlesex, UB1	sq m (2,300 sq ft) Unit 1 Retail Unit t/a Juice and Desert Shop 14 sq m (150 sq ft) Unit 2 Retail Unit t/a Beauty Salon 16 sq m (172 sq ft) Unit 3 Retail Unit t/a Takeaway 15 sq m (161 sq ft) Unit 4 Retail Unit t/a Hair Saloon 19 sq m (204 sq ft) Unit 5 Retail Unit t/a Bakery 12 sq m (129 sq ft) No. 2-6 Residential Accommodation 340 sq m (3,668 sq ft)		on the ground floor and a 15-bed residential/HMO on the first & second floors	<p><u>193408VAR</u></p> <p>Application for a Minor Material Amendment (S73) to vary condition 2 (approved plans) and 12 (outline delivery service plan) and remove conditions 6 (dimensions of service vehicles), 9 (noise level emitted from vehicle turntable), 10 (doors opening onto highways land), 11 (external finishing materials) and 13 (manufacturer's details for proposed vehicle turntable) of planning permission Ref: 178663FUL dated 06.06.2018 for: 'Change of use from retail (Use Class A1) to restaurant and café (Use Class A3); and single storey rear extension'. Amendments seek revised internal layout, site layout and flue design, to omit single storey rear extension and vehicle turntable and external alterations to ground floor rear elevation</p> <p>Granted with Conditions</p> <p>Thu 07 Nov 2019</p> <p><u>192494CND</u></p> <p>Details of external finishing materials pursuant to condition 11 of planning permission Ref: 178663FUL dated: 06.06.2018 for 'Change of use from retail (Use Class A1) to restaurant and café (Use Class A3); and single storey rear extension'</p> <p>Approved</p> <p>Thu 29 Aug 2019</p>

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
					<p><u>192420CND</u></p> <p>Details of cooking extract system including suitable levels of filtration and odour abatement pursuant to condition 3 of planning permission Ref: 178663FUL dated: 06.06.2018 as varied by Ref: 193408VAR dated: 07.11.2019 for 'Change of use from retail (Use Class A1) to restaurant and café (Use Class A3); and single storey rear extension'.</p> <p>Approved</p> <p>Wed 19 Feb 2020</p>
					<p><u>192790CND</u></p> <p>Manufacturers details of vehicle turntable pursuant to condition 13 of planning permission Ref: 178663FUL dated: 06.06.2018 for 'Change of use from retail (Use Class A1) to restaurant and café (Use Class A3); and single storey rear extension'</p> <p>Approved</p> <p>Thu 29 Aug 2019</p>
					<p><u>191952CND</u></p> <p>Details of the external finishing materials pursuant to condition 11 of planning application reference: 178663FUL dated 06.06.2018 for the 'Change of use from retail (Use Class A1) to restaurant and café (Use Class A3); and single storey rear extension'.</p> <p>Application Withdrawn</p>

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
					<p>Thu 18 Jul 2019</p> <p><u>191673NMA</u></p> <p>Application for a Non-Material Amendment (S96a) to planning permission Ref: 178663FUL dated 06.06.2018 for "Change of use from retail (Use Class A1) to restaurant and café (Use Class A3); and single storey rear extension". Application seeks reconfiguration of internal layout.</p> <p>Approved</p> <p>Fri 03 May 2019</p>
£180,000	7, South Road, Southall, Middlesex, UB1	1,238	70.32m	Restaurant	No
£1,100,000	65 South Road	3,209	365.34m	round floor retail shop with 3-bedroom flat / office space on the first floor.	No
£1,100,000	61, The Green, Southall, Greater London, UB2	2217	950.34m	Grocery shop	No
£1,200,000	61, The Green, Southall, Greater London, UB2	2217	950.34m	Grocery shop	No
POA	55, The Green, Southall, UB2	1000	934.79m	Office	No
POA	61, The Green, Southall, Greater London, UB2	-	950.34m	Basement Commercial (Currently Vacant) Ground Floor Commercial (Shop) First Floor	No

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
				HMO - 3 Bedrooms Second Floor 2 Bedroom Flat Third Floor Studio	
£475,000	96 The Green, Southall UB2 4BG	700	1.04km	Shop	<u>202815NMA</u> Application for a Non-Material Amendment (S96A) to planning permission Ref: 182180FUL dated 14.01.2020 for 'Redevelopment of the site to provide 120 flats and 958sqm commercial floor space on the ground floor (A1 use class) accommodated within a part eleven storey (fronting onto Broadway) and part fifteen storey (fronting onto Singapore Road) building, with associated amenity space, cycle and refuse storage, and connection to Green Man Lane district heating centre (following demolition of buildings on site)'. Amendment seeks to remove reference to number of approved flats and amount of commercial floor space within proposal description and add both references to condition 2 Approved Wed 12 Aug 2020
£250,000	King Street, Southall, Greater London, UB2	n/a	1.31km	Restaurant	- No planning constraints No - can't find exact location
POA	Dominion Road, Dover Court, Southall, UB2 5AL	3,500	1.13km	Leisure facility	-No planning constraints No - can't find exact location
POA	Featherstone Terrace, Southall,	3,584	1.12km	Commercial property	-No planning constraints No - can't find exact location

Price	Address	Size (Sqft)	Distance From Centre	Existing Use	Planning Constraints? /Previous Applications Submitted In Last 5 Years?
	Middlesex, UB2				
£5,500,000	Dokal Industrial Estate	18,405	1.2km	Light industrial facility	<p><u>225326FUL</u></p> <p>Part single part two storey front extension, relocated of front vehicle and pedestrian entrances of Unit 5, installation of cycle stand (following demolition of existing two storey element)</p> <p>Granted with Conditions</p> <p>Fri 04 Aug 2023</p> <p><u>223992FUL</u></p> <p>Alterations to the front (north) elevation facing Dokal Industrial Estate, involving the insertion of a roller shutter.</p> <p>Granted with Conditions</p> <p>Tue 08 Nov 2022</p> <p><u>195401FUL</u></p> <p>Construction of 36 self-contained affordable residential units over three storeys with associated landscaping, cycle and car parking spaces (following demolition and Change of Use)</p> <p>Granted with S106 conditions.</p> <p>Wed 29 Sep 2021</p>