



Infinite Hayes, 27 Uxbridge Road, London, UB4 0JN

PLANNING STATEMENT

September 2022

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by DP9 Limited on behalf of Infinite Partners (hereafter 'the Applicant') in support of an application for full planning permission for the redevelopment of Hyatt Place, 27 Uxbridge Road (hereafter 'the Site'). The application relates to the extension and alteration of the existing hotel building to create an innovative mixed-use development comprising a hotel and light industrial floorspace for small businesses (hereafter 'the Proposed Development' or 'the proposals'). The Site lies within the jurisdiction of the London Borough of Hillingdon (hereafter 'LBH' or 'the Local Planning Authority').

1.2 The Site is approximately 0.57 hectares in size and is located on the south-eastern corner of the junction of Uxbridge Road and Springfield Road in Hayes. The Site contains a 13-storey building (12 storeys plus plant room) which was constructed in the 1960s for use as offices. It is now in use as a Hyatt hotel. The main hotel block is located in the centre of the Site, with two flanking blocks two storeys high to the north-east and south-west. The remainder of the Site comprises car parking for 70 vehicles. The Site is located in the Springfield Road Industrial and Business Area, which forms part of the wider Hayes Industrial Area and is designated in the Development Plan as a Strategic Industrial Location (SIL).

1.3 This application proposes to refurbish and extend the existing hotel building and erect two C-shaped blocks on the eastern and western sides of the Site. The proposals would result in an uplift of 10,487m² (GIA) of floorspace on the Site, including 1,318m² (GIA) of light industrial space targeted at small and start-up industrial businesses, along with areas of new public realm on the northern and western edges of the Site. The description of the Proposed Development is as follows:

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

1.4 The Proposed Development is located within an Opportunity Area and seeks to make the best use of land, generating a number of benefits from an underutilised site. The proposal results in the introduction of 1,318m² (GIA) of high-quality light industrial space which meets an identified need for smaller business space and enhances the competitiveness of the SIL. The Proposed Development will drive inward investment to the area and facilitate local regeneration. The Applicant will commit to a bespoke Community Investment Programme setting out a number of initiatives designed to maximise the social value generated by the Proposed Development.

1.5 The Proposed Development is of an exemplary design, is accessible for all, creates new public realm and makes a significant contribution to urban greening. The Proposed Development aims to achieve the highest standards of sustainability, with a strategy centred on reducing the need to travel by car and retention of the existing hotel building, which contributes to a substantial reduction in embodied carbon.

1.6 This Planning Statement sets out the planning case for the proposed development. It assesses the development in the context of adopted and emerging planning policy and guidance at national, regional and local level.

1.7 The statement should be read in conjunction with all other information submitted with the planning application, as follows:

Covering letter DP9
Application Form and certificates DP9
CIL Additional Questions Form DP9
Site location plan Haptic
Existing plans and elevations Haptic
Proposed plans and elevations Haptic
Proposed landscape drawings BD Landscape Architects
Design and Access Statement Haptic
Hotel Sequential Test Report DP9
Hotel Needs Assessment CBRE
Commercial Strategy Report AND
Townscape and Visual Impact Assessment The Townscape Consultancy
Transport Assessment Caneparo Associates
Travel Plan Caneparo Associates
Delivery and Servicing Plan Caneparo Associates
Outline Construction Logistics Plan Caneparo Associates
Demolition and Construction Method Statement Caneparo Associates
Daylight and Sunlight Assessment Point 2
Noise Impact Assessment Love Design Studio
Air Quality Assessment Love Design Studio
Energy and Sustainability Statement Love Design Studio
Circular Economy Statement Love Design Studio
Whole Lifecycle Carbon Assessment Love Design Studio
Water Cycle Strategy Love Design Studio
Wind and Microclimate Analysis Love Design Studio
Tree Survey and Arboricultural Impact Assessment Hayden's
Preliminary Ecological Appraisal Tim Moya Associates
Fire Statement One Stop Fire
TV and Radio Signal Survey and Reception Impact Assessment GTech Surveys
Preliminary Risk Assessment Report Jomas Associates Ltd
Flood Risk Assessment and Surface Water Management Strategy Engineeria
Basement Impact Assessment GEA
Utilities Statement Woodcote Power
Statement of Community Involvement BECG
Community Investment Programme Summary Infinite Partners.

1.8 This Planning Statement is structured as follows:

Section 2 provides a review of the Site location and its surrounding context;
Section 3 sets out the background and planning history of the Site;
Section 4 details the pre-application discussions which have taken place;
Section 5 describes the proposed development in detail;
Section 6 sets out the relevant planning policy and guidance;
Section 7 assesses the proposal against relevant planning policy;
Section 8 sets out a summary of the proposed planning obligations;
Section 9 provides conclusions.

2.0 THE SITE AND CONTEXT

2.1 The Site is approximately 0.57 hectares in size and is located on the south-eastern corner of the junction of Uxbridge Road and Springfield Road in Hayes. The Site accommodates a 13-storey building which was erected in the 1960s for use as office accommodation but has been in use as a hotel since circa. 2016. The hotel is currently operating under the Hyatt brand and serves local businesses and the tourism market, including travellers using Heathrow Airport, which is located approximately 4 miles from the Site.

2.2 The main hotel block is located in the centre of the Site, with two-storey flanking blocks on the north-eastern and south-western sides of the building. The Site is surrounded by a concrete surface-level car park, with further undercroft car parking on the eastern side of the Site. In total, there are spaces for 70 vehicles. The Site contains 18 semi-mature trees and a limited amount of shrubbery along the front boundary, but otherwise contains very little soft landscaping.

2.3 The site is located in the Springfield Road Industrial and Business Area which is designated in the Development Plan as a Strategic Industrial Location (SIL). The Site adjoins other industrial and business uses to the south. To the west, on the opposite side of Springfield Road, is an industrial park containing several large-format retail warehouses and beyond that is Minet Country Park and Hayes Town Centre, which is approximately 750 metres from the Site. To the north, on the opposite side of Uxbridge Road, is a small parade of shops with offices and residential uses above, and beyond that is a large body of low-rise residential development. Adjoining the Site to the east at 15-17 Uxbridge Road is a vacant plot which has an extant planning consent for an aparthotel.

2.4 Uxbridge Road forms part of the Strategic Road Network (SRN). The Parkway/Ossie Gavin Roundabout, connecting Uxbridge Road with the A312, is approximately 350 metres to the west. The nearest train station to the Site is Southall, which lies approximately 1.7 kilometres to the south-east and provides access to mainline rail services from Paddington station. Hayes and Harlington Station, which is served by the newly opened Elizabeth Line, is located approximately 3 kilometres to the south-west. The Site has good access to local bus services, with five bus stops within close walking distance of the Site. The Site has a Public Transport Accessibility Level (PTAL) of 3 (moderate).

3.0 RELEVANT PLANNING HISTORY

Relevant planning applications for the Site

3.1 The Site has been subject to several planning applications since the building was constructed. These include applications for signage, external repairs, plant and other minor alterations which are not relevant to this application and are not listed here. The planning history most relevant to this application is set out below.

<u>Reference</u>	<u>Proposal</u>	<u>Decision</u>
2385/APP/2015/1464	Variation of Condition 2 (Approved drawings) and Condition 7 (accessible bedrooms) of planning application 2385/APP/2013/2523 (Change of Use of existing office (B1) building to create 170 bedroom hotel (C1) use with ancillary car parking and landscaping) to allow for a reduction in the provision of rooms with hoists.	Approved 15/09/17
2385/APP/2013/2523	Change of Use of existing office (B1) building to create 170 bedroom hotel (C1) use with ancillary car parking and landscaping.	Approved 18/02/14
2385/APP/2011/1143	Application for a new planning permission to replace an extant planning permission in order to extend the time limit for implementation ref: 2385/APP/2005/3477 dated 16/6/2008- Change of use of Hayes gate house from office to hotel and conference facilities, alterations to Hayes Gate House building, erection of a freestanding three storey media centre, ancillary car parking and landscaping.	Approved 16/06/12
2385/APP/2005/3477	Change of use of Hayes Gate House from office to hotel and conference facilities., alterations to Hayes Gate House building, erection of a freestanding three storey media centre, ancillary car parking and landscaping.	Approved 16/06/08
2385/APP/2001/99	Change of use from offices, redevelopment of petrol filling station to provide a hotel including alterations to external appearance and erection of an entrance canopy.	Approved 17/12/02

Other relevant planning applications

3.2 The area surrounding the Site is undergoing significant regeneration, reflecting its location along the newly opened Elizabeth Line. A number of emerging developments both in the immediate vicinity of the Site and in the wider context feature larger and taller built elements and represent a step change from the area's pre-existing and predominantly low-rise character. The majority of new development is located to the south and east of the Site. Further details of these developments and a map showing their locations can be found within the Design and Access Statement.

Adjacent site at 15-17 Uxbridge Road

3.3 The adjacent plot, 15-17 Uxbridge Road, benefits from an extant consent for a 12-storey apartment scheme (Ref: 69827/APP/2015/4719). This permission has been implemented through the excavation of trenches on the site, as confirmed by a Certificate of Lawfulness dated 04 June 2020 (Ref: 69827/APP/2020/1090). An application for a revised apartment scheme of 15 storeys in height (Ref: 69827/APP/2021/1565) was submitted to the Local Planning Authority in April 2021 and was presented to the Hillingdon Major Applications Planning Committee on 16 September 2021. It was resolved to grant planning permission for the scheme, but the final decision has not yet been issued.

Relevant consented schemes within the wider context

3.4 Approximately 440 metres to the south of the Site along Springfield Road lies the West London Film Studios, which was granted consent in December 2020 for a new building containing sound stages, workshops and offices (Ref: 6378/APP/2019/297). The expansion will increase studio space at the site and significantly enhance film-making capacity, with the application receiving letters of support from Marvel, Netflix and several other streaming services and production companies intending to use the new studio space.

3.5 Other developments within the emerging context include the consented scheme at the Hamborough Tavern, which is less than half a mile from the Site within the London Borough of Ealing (Ref: 184519FUL). This application permitted a hotel of up to 15 storeys in height with ancillary commercial uses. Further east, consented schemes at Southall Sidings (Ref: 201888FUL), the Cattle Market (Ref: 200471FUL) and Park View Place (Ref: 182843FUL) have permitted buildings of up to 16 storeys high.

3.6 To the south of the Site, beyond the railway line, a number of large-scale developments are under construction, with the most significant in scale being the Southall Waterside Masterplan (Outline Consent Ref: 171562VAR), which will redevelop a large vacant industrial site into a higher density residential-led mixed use quarter. There are also consents for residential developments of up to 27 storeys at the Margarine Works (Outline Consent Ref: 183673OUT) and up to 24 storeys at The Arches Business Centre (Ref: 181380FUL), as well as for redevelopment of the former Nestle Factory to provide over 1,380 new homes, which is within the London Borough of Hillingdon (Ref: 1331/APP/2017/1883).

3.7 Just north of the former Nestle Factory and also within Hillingdon, consent exists for the redevelopment of Bull's Bridge Industrial Estate to create a new data centre complex (Ref: 75111/APP/2020/1955). Known as Union Park, the development consists of three main blocks covering a substantial footprint, along with two energy centres and a visitor reception.

4.0 PRE-APPLICATION DISCUSSIONS AND CONSULTATION

Pre-application discussions

4.1 The Applicant has engaged extensively with officers from LBH and the Greater London Authority (hereafter ‘the GLA’) via the formal pre-application process and in accordance with a Planning Performance Agreement (PPA). Four scheme iterations have been presented to LBH officers at five pre-application meetings held between October 2021 and June 2022. Three meetings have been held with the GLA on 22 February, 12 April and 23 June 2022. Further meetings have been held with other relevant consultees, including LBH’s Policy Team and the Metropolitan Police.

4.2 The pre-application feedback received has informed the evolution of the Proposed Development. A number of key design moves have been made since October 2021, including a step back from the initial ‘perimeter block’ typology and the breaking down and refinement of massing to form the impression of a collection of buildings along the site’s edge. Significant reductions in height have been made to the two C-blocks, which have also been set back from the boundaries to provide greater separation distances between the proposal and the adjacent site and to create new areas of landscaped public realm. Further details as to how the pre-application process has informed the final design of the Proposed Development can be found in the Design and Access Statement submitted with this application.

4.3 The Proposed Development was initially presented to LBH as a car-free scheme. Later iterations of the scheme proposed to increase the amount of car parking on the Site following feedback from LBH officers that the amount of parking proposed was too low and would likely displace vehicle parking onto surrounding roads. It should be noted that the GLA do not support this increase. The amount of parking spaces now proposed, when accompanied by the range of measures being proposed to reduce reliance on car travel, seeks to strike an appropriate balance between LBH’s concerns and the need to encourage more sustainable modes of transport in line with planning policy. For further details, please refer to the Transport Assessment and Travel Plan submitted with this application.

4.4 As part of the pre-application process, the Applicant has reached agreement with the Local Planning Authority in terms of the key townscape views to be tested (as set out in the TVIA) and has sought advice on the parameters of the Sequential Test from the LBH Policy Team. A list of documents for submission with the application have also been agreed, all of which have been submitted with this application (as listed in Section 1.0 of this Statement).

Public consultation

4.5 The Applicant has undertaken a comprehensive engagement process with the local community during preparation of this planning application. A public exhibition was held (virtually and ‘in person’) in June 2022, to which over 3,500 local residents and businesses were invited. A public consultation website set up to enable people to engage with the proposals received 1,496 visits. In addition, the Applicant has engaged extensively with local businesses and community groups. Further details can be found in the Statement of Community Involvement (SCI) prepared by BECG and submitted with this application.

4.6 Overall, feedback from the Applicant’s consultation has been positive, with consultees expressing particular support for the Community Investment Programme (discussed further in Section 8.0 of this Statement). Two written responses were received, both expressing concern about the amount of parking proposed and the consequential impact for parking on surrounding streets. In response to these concerns (as well as feedback from LBH during the pre-application process), the proposal has increased the amount of car parking spaces and is underpinned by a significant

package of transport measures to provide realistic alternatives to car travel, including a minibus service, a substantial amount of cycle parking and a robust Travel Plan. Further details of these measures can be found in Section 7.0 of this Statement and the Transport Assessment and Travel Plan submitted with this application.

5.0 THE PROPOSED DEVELOPMENT

5.1 The application proposes to develop the Site to form a new mixed-use campus comprising a hotel and light industrial floorspace. Specifically, the proposal includes:

- 15 units (totalling 1,318m²) of light industrial space at ground floor level, specifically designed for small and start-up industrial businesses, along with shared facilities, a dedicated loading bay and external yard space;
- 9,169m² (GIA of) of additional hotel floorspace with ancillary facilities;
- A total of 918m² of new public realm along Uxbridge Road and Springfield Road;
- A total of 1,971m² of external amenity space, including two internal landscaped courtyards;
- A total of 95 cycle parking spaces, including 3 spaces for cargo cycles and a 'cycle hire' facility with 20 bicycles available for guest use; and
- A total of 39 vehicle parking spaces located at ground floor level - 32 for the hotel and 7 van parking spaces for the light industrial space, one of which will be a designated car club bay.

5.2 With the exception of the two flanking blocks to the north-east and south-west, the existing building forming the Hyatt hotel (referred to in this application as the 'central block') is to be retained and refurbished. A total of 15 additional hotel rooms are created at ground and first floor level, within the envelope of the existing building. The building will be extended to the front (along Springfield Road) for the full height of the building in order to create a new lobby at ground floor and additional rooms on the upper floors. The existing plant enclosure at thirteenth floor level will be removed and replaced with two additional storeys of hotel accommodation (with an overall increase in height of approximately 2 metres). The central block will be re-clad to enhance thermal and acoustic performance and to integrate it with the design of the new buildings.

5.3 Two C-shaped blocks are proposed on either side of the central block. These range from 6 to 8 storeys and connect to the main hotel building via a series of external walkways (referred to in the application as 'galleries'). The western C-block contains double-height industrial space at ground and mezzanine level, hotel facilities at first floor and hotel rooms on the upper floors. The eastern C-block contains hotel accommodation only (including a flexible amenity pavilion on the second floor, designed to be used for activities such as yoga). Two landscaped courtyards are proposed on the eastern and western sides of the Site, and there are four external roof terraces provided for the use of hotel guests (located at seventh, eighth and thirteenth floor level).

5.4 The proposed hotel is targeted at local businesses, in particular those located in the surrounding town centres and industrial areas. In addition, it is expected that the hotel will continue to attract custom from businesses further afield and from the leisure and tourism market. As such, a degree of flexibility is required in the hotel provision to cater for varying guest requirements and the fact that workers are likely to stay for flexible periods, from a few days to several weeks or months. Rooms are either small, medium or large, with the larger rooms designed to be able to accommodate conversion to a suite. Of the new-build rooms, 23 are wheelchair accessible. Details of room layouts can be found in the Design and Access Statement.

5.5 Vehicular access into the Site will be from Springfield Road, using the existing crossover on the Site's southwestern corner. This will provide direct access to the new on-site car park and the servicing locations for each of the proposed uses. Two existing vehicular access points further along Springfield Road and on Uxbridge Road will be removed and the footway reinstated, thus reducing vehicular access to a single crossover. Two new pedestrian entrances will be created on Uxbridge Road to serve the hotel and light industrial elements respectively. New areas of high-quality landscaped public realm will be created on the Uxbridge Road and Springfield Road frontages.

5.6 The proposal seeks to provide a 'car-lite' approach. A total of 32 hotel parking bays (14 accessible bays and 18 standard) are provided in a dedicated parking area to the east of the Site. A covered setting-down point is provided to enable the dropping off and picking up of hotel guests by car. The development also includes 6 spaces and 1 car club bay for vans, located to the south of the Site and exclusively for use of the industrial units. The proposal is supported by a comprehensive package of measures to provide realistic and attractive alternatives to car travel, such as a dedicated shuttle bus to transport guests between the Site and public transport services (details of which can be found in the Transport Assessment submitted with this application).

5.7 This application is accompanied by the following drawings:

INF-HAP-ZZZ-ZZ-DR-A-00001	Site Location Plan
INF-HAP-ZZZ-ZZ-DR-A-00002	Block Plan
INF-HAP-ZZZ-B01-DR-A-02001	Existing Basement Floor Plan
INF-HAP-ZZZ-L00-DR-A-02002	Existing Ground Floor Plan
INF-HAP-ZZZ-L01-DR-A-02003	Existing First Floor Plan
INF-HAP-ZZZ-L02-DR-A-02004	Existing Second Floor Plan
INF-HAP-ZZZ-L03-DR-A-02005	Existing Third Floor Plan
INF-HAP-ZZZ-L04-DR-A-02006	Existing Fourth Floor Plan
INF-HAP-ZZZ-L05-DR-A-02007	Existing Fifth Floor Plan
INF-HAP-ZZZ-L06-DR-A-02008	Existing Sixth Floor Plan
INF-HAP-ZZZ-L07-DR-A-02009	Existing Seventh Floor Plan
INF-HAP-ZZZ-L08-DR-A-02010	Existing Eighth Floor Plan
INF-HAP-ZZZ-L09-DR-A-02011	Existing Ninth Floor Plan
INF-HAP-ZZZ-L10-DR-A-02012	Existing Tenth Floor Plan
INF-HAP-ZZZ-L11-DR-A-02013	Existing Eleventh Floor Plan
INF-HAP-ZZZ-L12-DR-A-02014	Existing Twelfth Floor Plan
INF-HAP-ZZZ-L14-DR-A-02015	Existing Roof Plan
INF-HAP-ZZZ-ZZ-DR-A-03001	Existing Outer North and West Elevations
INF-HAP-ZZZ-ZZ-DR-A-03002	Existing Outer South and East Elevations
INF-HAP-ZZZ-ZZ-DR-A-04001	Existing Sections
INF-HAP-ZZZ-B01-DR-A-10001	Proposed Basement Floor Plan
INF-HAP-ZZZ-L00-DR-A-10002	Proposed Ground Floor Plan
INF-HAP-ZZZ-L01-DR-A-10003	Proposed First Floor Plan
INF-HAP-ZZZ-L02-DR-A-10004	Proposed Second Floor Plan
INF-HAP-ZZZ-L03-DR-A-10005	Proposed Third Floor Plan
INF-HAP-ZZZ-L04-DR-A-10006	Proposed Fourth Floor Plan
INF-HAP-ZZZ-L05-DR-A-10007	Proposed Fifth Floor Plan
INF-HAP-ZZZ-L06-DR-A-10008	Proposed Sixth Floor Plan
INF-HAP-ZZZ-L07-DR-A-10009	Proposed Seventh Floor Plan
INF-HAP-ZZZ-L08-DR-A-10010	Proposed Eighth Floor Plan
INF-HAP-ZZZ-L09-DR-A-10011	Proposed Ninth Floor Plan
INF-HAP-ZZZ-L10-DR-A-10012	Proposed Tenth Floor Plan
INF-HAP-ZZZ-L11-DR-A-10013	Proposed Eleventh Floor Plan
INF-HAP-ZZZ-L12-DR-A-10014	Proposed Twelfth Floor Plan
INF-HAP-ZZZ-L13-DR-A-10015	Proposed Thirteenth Floor Plan
INF-HAP-ZZZ-L14-DR-A-10016	Proposed Roof Plan
INF-HAP-ZZZ-ZZ-DR-A-11001	Proposed Outer North and West Elevations
INF-HAP-ZZZ-ZZ-DR-A-11002	Proposed Outer South and East Elevations
INF-HAP-ZZZ-ZZ-DR-A-11003	Proposed Inner North and West Elevations
INF-HAP-ZZZ-ZZ-DR-A-11004	Proposed Inner South and East Elevations
INF-HAP-ZZZ-ZZ-DR-A-11005	Proposed Central East and West Elevations
INF-HAP-ZZZ-ZZ-DR-A-12001	Proposed Sections

6.0 PLANNING POLICY FRAMEWORK

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this application comprises the following documents:

- The London Plan (2021)
- Hillingdon Local Plan: Part 1 – Strategic Policies (2012)
- Hillingdon Local Plan: Part 2 – Development Management Policies (2020)
- Hillingdon Local Plan: Part 2 – Site Allocations and Designations (2020).

6.2 The Site has the following designations in the Development Plan:

- Strategic Industrial Location (Hayes Industrial Area)
- Preferred Industrial Location (Springfield Road Industrial and Business Area)
- Hillingdon Air Quality Management Area
- Ossie Garvin Air Quality Focus Area.

6.3 The London Plan designates Hayes as an Opportunity Area (hereafter 'OA'). This forms part of the wider Heathrow OA , which has an indicative target of 9,000 new homes and 12,000 new jobs over the plan period. Although the boundaries of the OA have not yet been precisely defined, the indicative land area as shown in the London Plan includes the area south of Uxbridge Road where the development is located, and therefore planning policy relating to the OA is referred to in this Planning Statement.

6.4 The National Planning Policy Framework (hereafter 'the NPPF') provides planning policy guidance at a national level and is a material consideration in the determination of planning applications. The NPPF was first adopted in 2012, with updated versions in 2019 and a further revision in July 2021. The NPPF sets out a presumption in favour of sustainable development (Paragraph 11) and states that developments which are supported by an up-to-date development plan should be approved without delay (Paragraph 11c). The NPPF is supported by online Planning Practice Guidance (hereafter 'the NPPG'). The Government also published a National Design Guide in 2019 and this is also a material consideration in the determination of this proposal.

6.5 The Mayor of London and LBH have adopted a series of Supplementary Planning Guidance/Documents (SPGs/SPDs) to guide the application of planning policy. The following SPGs/SPDs are considered relevant to this application:

Mayor of London – Adopted Guidance

- Accessible London (2014)
- Planning for Equality and Diversity in London (2007)
- Character and Context (2014)
- Social Infrastructure (2015)
- 'Be Seen' Energy Monitoring (2021)
- Energy Assessment Guidance (2020)
- Whole Life-Cycle Carbon Assessments (2022)
- Circular Economy Statements (2022)
- The Control of Dust and Emissions during Construction and Demolition (2014)
- Crossrail Funding (2016)

Mayor of London – Draft Guidance

Fire Safety (2022)
Housing Design Standards (2022)
Optimising Site Capacity (2022)
Urban Greening Factor (2021)
Air Quality Neutral (2021)
Sustainable Transport Walking and Cycling (2021)

London Borough of Hillingdon – Adopted Guidance

Planning Obligations (2014)
Accessible Hillingdon (2017)

7.0 PLANNING ASSESSMENT

Land use

Principle of redevelopment

7.1 Para. 119 of the NPPF provides that planning decisions should promote an effective use of land, making as much as use as possible of previously developed sites and encouraging '*multiple benefits from both urban and rural land, including through mixed-use schemes*' (para. 120). This is reflected in Policy GG2 of the London Plan, which provides that development should aim to make the best use of land and that those involved in planning and development should enable the development of brownfield sites, particularly those in Opportunity Areas. Policy SD1 also states that development in Opportunity Areas should, *inter alia*, support and sustain Strategic Industrial Locations (SILs) by considering opportunities to intensify and make more efficient use of land within SILs.

7.2 Whilst the building at 27 Uxbridge Road has been in continuous use for several decades (firstly as an office and then as a hotel), it sits on a relatively small footprint within the Site. The remainder of the Site is a car park which, in recent years, has experienced low levels of demand (please refer to the submitted Transport Statement for further detail). These proposals represent an opportunity to better use the Site's capacity to meet both a strategic and local need for visitor accommodation, to enhance the competitiveness of the SIL by introducing new light industrial uses and to deliver a number of benefits such as the creation of new employment opportunities and high-quality workspace for small and start-up businesses. In this regard the principle of development is consistent with the aims of the NPPF and Policies GG2 and SD1 to make the most effective use of land.

Light industrial units

7.3 The NPPF sets an economic objective to help build a strong, responsive and competitive economy, and provides that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Para. 81 states that significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

7.4 Policy E5 of the London Plan provides, in Part C, that development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 (this includes light industrial uses, previously falling with Class B1 (c) and now within Class E (g)). Policy E7 states that development plans and proposals should be proactive in encouraging the intensification of business uses in Classes B1c, B2 and B8 occupying all categories of industrial land by, *inter alia*, introducing smaller units and making more efficient use of land. Policy E2 encourages a range of different types and sizes of business space to ensure that suitable space is available for SMEs and businesses wishing to start-up or expand.

7.5 At a local level, Policy E2 of the Hillingdon Local Plan Part 1 (hereafter 'HLP Part 1') and Policy DME1 of the Hillingdon Local Plan Part 2 (hereafter 'HLP Part 2') provide that the Council will support employment proposals in Strategic Industrial Locations (SILs) in accordance with relevant policies in the London Plan. Policy E6 of the HLP Part 1 explicitly recognises the low level of business start-ups in the borough and encourages the development of affordable accommodation for small and medium-sized businesses in appropriate locations.

7.6 This application proposes the creation of 1,318m² (GIA) of high-quality light industrial space which has been specifically designed for smaller industrial businesses such as those within the creative

industries and small-scale manufacturing. The proposed light industrial space features a range of unit sizes which are flexible and adaptable to cater for changing requirements over time. The proposal is underpinned by extensive research of local need and demand, which revealed that the local industrial inventory features several large-format spaces but is lacking in provision for industrial occupiers that require small spaces with shared facilities. Further detail is set out in the Commercial Strategy prepared by AND submitted with this application.

7.7 The proposed light industrial use is one which is supported in a SIL, as set out in Policies E4 and E5. The proposal introduces smaller units to the SIL which cover a range of types and sizes, increasing the diversity of businesses which are able to operate from the SIL and enhancing its competitiveness. The proposal has been specifically designed to cater for start-up and micro businesses, with all of the facilities such businesses need to incubate and build from the outset, meeting an identified local need as well as a wider need for such accommodation across London. As such, it is firmly in line with the objectives of the NPPF, London Plan and HLP Parts 1 and 2. Furthermore, the proposals bring the Site back into industrial use for the first time in decades. This should be considered a key benefit of the Proposed Development and is a material consideration which should be afforded significant weight.

Intensification of a non-industrial use in a SIL

7.8 Policy E5 of the London Plan provides that SILs should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy. Part C of Policy E5 provides that development proposals in SILs should be supported where the proposed uses fall within the industrial-type activities set out in Policy E4. Policy E7 (Part B) provides that delivery of residential and other uses in SILs should only be considered as part of a plan-led process and not through '*ad hoc planning applications*'.

7.9 Policy DME1 of the HLP Part 2 provides that non-employment uses will be acceptable in SILs only where there is no realistic prospect of the land being developed for employment or industrial uses or the site has been vacant and consistently marketed for a period of 2 years, and the proposed alternative use does not conflict with the policies and objectives of the Plan.

7.10 A hotel use (Class C1) is not one of the uses set out in Part A of Policy E4 and the land is not being 'released' as part of a plan-led process. Neither is it being argued that there is no reasonable prospect of the land being developed for employment or industrial uses (indeed, the Proposed Development incorporates some light industrial floorspace for which there is a clear demand). Therefore, in technical terms, the proposal is not in accordance with the Development Plan. However, there are a number of important material considerations which weigh in favour of granting planning permission in this instance, and these are set out below.

7.11 Firstly, despite the SIL designation, there are currently no industrial uses on the Site and it is in exclusive use as a hotel (operating under a consent from 2014). Based on the Site's planning history, it appears that it has not in fact been used for any industrial-type use since at least the 1960s. No industrial land is being lost in order to deliver the scheme. To the contrary, the Proposed Development would result in a net gain in light industrial floorspace, as set out above.

7.12 Secondly, there is a resolution to grant planning consent on the adjacent site, 15-17 Uxbridge Road, for an aparthotel (Ref: GLA/2021/0635/S1), to which neither LBH nor the GLA had any objection on the basis that there was an extant planning permission for an aparthotel on the site. Para. 18 of the GLA Stage 2 report for that application states:

“...the proposal represents a clear conflict with the London Plan insofar as it relates to the introduction of non-industrial uses into a designated SIL. Notwithstanding this, GLA officers acknowledge that there is an extant planning permission for a hotel on the site and accept that this is a material consideration which carries significant weight. Therefore, notwithstanding the policy presumption against the introduction of non-industrial uses in SIL, the proposal remains acceptable.”

7.13 This position was accepted by LBH officers when resolving to grant consent, with para. 7.01 of the Committee Report stating that the principle of development had been established by previous permissions for the apartment use. In the case of Hyatt Place, a hotel use was authorised (in 2014) and was later implemented (circa. 2016). Applying the same logic, the authorised use of the Site as a hotel is a material consideration carrying significant weight and the proposal is acceptable notwithstanding the policy presumption against the introduction of non-industrial uses in SIL. This approach has been discussed with officers throughout the pre-application process and the feedback received suggests that this is a position which is broadly accepted by both LBH and the GLA.

7.14 Thirdly, the light industrial space at ground floor level is a SIL-conforming use under the terms of Policy E4, and provides a number of benefits (as set out above). This can only be delivered by the applicant alongside other uses. Consequently, although there is a technical non-compliance with Policy E5 (Part C), the proposal as whole – which requires an uplift in hotel rooms in order to render it deliverable by the Applicant – is still meeting the objectives of London Plan and Local Plan policy, that being to ensure a sufficient supply of industrial land and enhance the attractiveness and competitiveness of London’s Strategic Industrial Locations.

Strategic and local need for hotel accommodation

7.15 Policy E10 of the London Plan provides that London’s visitor economy and associated employment should be strengthened and that a sufficient supply and range of serviced accommodation should be maintained, taking into account the needs of business as well as leisure visitors. The 2017 GLA Economics Paper *‘Projections of demand and supply for visitor accommodation in London to 2050’* estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum (with Hillingdon expected to accommodate 8.5% of this additional demand). Policy E2 of the HLP Part 1 sets out a strategic need for 3,800 additional bedrooms over the Plan period and recognises the importance of visitor accommodation to the local economy.

7.16 This application is accompanied by a Hotel Needs Assessment prepared by CBRE. This confirms that in addition to a London-wide need for hotel accommodation, there is a local need for a hotel of the type proposed. The report concludes that hotels in proximity of the site operated close to 80.0% occupancy in 2019, indicating a supply-constrained market pre-pandemic. In 2021, occupancy levels were close to 70%, well above the wider London average (38%). Given that demand levels in London are projected to return to pre-pandemic levels by 2024-25, there will be a need for additional quality guest accommodation in the area to capture historically unsatisfied demand as well as to support and complement future developments. It is worth noting that the current Hyatt hotel on the Site is operating at 95% capacity.

7.17 The proposed hotel is intended as a specialist hotel for workers and is to be owned and operated directly by the applicant as an independent brand. It will therefore serve a hyper-local need generated by existing businesses located in the SIL (for example the West London Film Studios), wider industrial locations (such as the new development in Bull’s Bridge Industrial Estate) and nearby town centres. The intention is to ground the hotel and the associated industrial offer in the local

business community (for example, by offering corporate memberships to local companies) so that it can support these businesses, as well as any future light industrial businesses on-site.

7.18 The proposal results in an uplift of 265 hotel rooms on the Site, which would make a significant contribution towards meeting a strategic need for hotel accommodation in London and at Borough-wide level, as well as meeting a site-specific demand for quality hotel accommodation to serve the local business community. The Proposed Development is therefore in line with Policy E10 and local policy objectives to increase the supply of visitor accommodation.

Sequential Test

7.19 Para. 87 of the NPPF, Policy SD7 of the London Plan and Policy DMTC1 of the HLP Part 2 require a sequential approach to be applied to planning applications for main town centre uses (including hotels) which are neither in an existing centre nor in accordance with an up-to-date plan. The Site is not in an existing centre and Policies DME5 and SEA2 of the HLP Part 2 direct hotel growth only to '*sustainable locations*' (Uxbridge and Hayes Town Centres). Consequently, a sequential test is required to demonstrate that there are no sequentially preferable sites which would accommodate the identified need. In line with the above, a Sequential Test has been provided as part of this application.

7.20 The NPPF sets out that main town centre uses should be located in town centres, then in edge of centre locations, and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. Para. 12 of the NPPG recognises that main town centre uses sometimes have particular market and locational requirements which mean that they may only be accommodated in specific locations. In this instance, the need for the proposed hotel is partially generated by local demand, and therefore the most appropriate choice for the proposed development is the immediate vicinity of the Site, rather than a town centre. Notwithstanding this, and in response to advice received at pre-application stage, the Sequential Assessment has considered site allocations, planning permission for hotels and sites on the market within the seven retail centres that are well-connected to the Site by a journey of 30-minute or less using public transport.

7.21 Applying the above parameters, the sequential assessment identified 19 sites for assessment, none of which were considered to be suitable, available and viable for the proposed development, even when considering disaggregation. The Sequential Test is therefore passed.

Compatibility with industrial uses and Agent of Change

7.22 Policies E5 and E7 of the London Plan provides that development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis, ensuring that industrial activities are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation.

7.23 Policy D13 of the London Plan places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development (known as the 'Agent of Change' principle). The policy states that local planning authorities should consider existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby, and that new development should be designed to ensure that established nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

7.24 Details of how the Proposed Development satisfies the requirements of Policies E5, E7 and D13 are set out in further detail elsewhere in this Statement and in the Design and Access Statement submitted with this application. In summary, the following design considerations ensure that the intensification of the ‘sensitive’ hotel use does not prejudice the operation of the industrial space on site nor within the wider Strategic Industrial Location:

- The layout and separation of the two uses proposed on the Site have been carefully considered to ensure that there are no conflicts between future occupiers of the hotel and the light industrial units, including separate and clearly defined entrances for each use;
- The entrance to the hotel addresses Uxbridge Road, facing away from the SIL, preventing any conflict between hotel guests and existing industrial businesses;
- The design concentrates the majority of the new-build hotel rooms away from the rear boundary and, where feasible, away from existing noise-generating businesses;
- All new hotel rooms congregate around two new courtyards, which are designed to be used as amenity spaces for guests and which are shielded from all surrounding sources of noise;
- All servicing for the site will be located on-site, preventing any interference with the existing operation of the local SIL businesses; and
- All new-build hotel rooms are designed to a high level of acoustic protection, ensuring that any external noise is minimised within each room (please refer to the Noise Assessment submitted with this application).

7.25 It is important to note that the existing hotel on the Site has operated successfully in an industrial location for nearly a decade and has not, to the Applicant’s knowledge, compromised the viability of any businesses within the SIL. Furthermore, although it is accepted by the Applicant that a hotel is a ‘noise sensitive’ use, it is arguably less sensitive than a residential use, and less likely to attract complaints from occupants on an ongoing basis. This was accepted during determination of the adjacent scheme, with the committee report noting that guests staying for limited periods of time *‘would not expect the same level of amenity in terms of peace, quietness and ambience as they would at home’*.

7.26 Given the above, the Proposed Development will not compromise the integrity of effectiveness of the SIL, nor curtail any of the industrial activities within it. In line with the Agent of Change principle, the development has been designed to ensure that established nuisance-generating uses (and the new industrial space proposed on the Site) can remain viable and can continue or grow without unreasonable restriction. Consequently, the proposal complies with Policies E5, E7 and D13.

Summary of land use considerations

7.27 The Proposed Development is located with an Opportunity Area and is consistent with national and London-wide policy which seeks to make the best use of land, generating a number of benefits (including new jobs and industrial space) from an underutilised site. The proposal includes 1,318m² (GIA) of high-quality light industrial space which meets an identified need for smaller business space and enhances the competitiveness of the SIL.

7.28 Whilst the proposed hotel is not an industrial type use as set out in Policy E4 of the London Plan, the fact that the Site is in lawful use as a hotel is a material consideration which should be given considerable weight (in the same manner as it was during determination of the application for the adjacent scheme). It has been demonstrated that there is a strategic and local demand for hotel accommodation, and a Sequential Test has demonstrated that there are no sequentially preferable sites in an existing centre or edge-of-centre location to meet that need. The Proposed

Development would not compromise the viability of existing noise-generating uses within the SIL. Given the above, the Proposed Development is considered acceptable in land use terms.

Design

7.29 The NPPF attaches significant importance to the need for high-quality design, noting that good design is a key aspect of delivering sustainable development. Para. 30 provides that decisions should ensure that developments function well, are visually attractive and sympathetic to local character, and should establish a strong sense of place. These aims are reflected in Chapter 3 of the London Plan, which sets out key urban design principles to guide development in London. At a local level, policies BE1 and DMHB11 of the Local Plan require new development to harmonise with its context, ensure the use of high-quality building materials and finishes and protect features of positive value within and adjacent to the site.

7.30 The design of the Proposed Development has evolved in tandem with an extensive process of pre-application engagement with LBH and the GLA, as set out in Section 4.0 of this Planning Statement.

7.31 The final composition of the Proposed Development comprises a central point of height, the existing hotel block, which is of a simple and linear form and is extended forwards to Uxbridge Road to form a new hotel lobby and improve the building's relationship with the public realm. The two C-blocks either side of the central block create a uniform edge to the Site but are split into smaller elements to create a 'broken courtyard' typology. This works to break down massing and allows for the creation of internal landscaped courtyards that would be visible from the public realm through gaps in the buildings.

7.32 The Proposed Development's architectural expression would feature a distinctive approach for the outer and inner elevations. The outward-facing facades would comprise a consistent application of framing across both the existing and new blocks, with the facade of the existing hotel updated to follow the same principles and ensure a unified architectural expression (and representing a significant improvement on the existing building's dated appearance and 'staggered' elevation treatment). The Applicant is committed to creating buildings of an exemplary design, using materials of the highest quality. Further details on architectural expression, fenestration detail and proposed materials can be found in the Design and Access Statement submitted with this application.

7.33 This application is submitted with a Townscape and Visual Impact Assessment (TVIA) prepared by the Townscape Consultancy. This considers, in detail, the visual impact of the Proposed Development on the area around the Site, having regard to the character of the surrounding townscape. It also assesses the effect of the Proposed Development on views from locations around the Site. The consultants' independent assessment is that this is a well-judged design of high quality, which achieves the desired outcomes for the Site whilst contributing positively to the surrounding existing and emerging contexts.

Tall buildings

7.34 Policy D9 of the London Plan 2021 requires Development Plans to define what is considered a tall building (Part A). It then requires local planning authorities to determine whether there are any locations where tall buildings may be an appropriate form of development and identify these locations on maps in Development Plans, and states that tall buildings should only be developed in those defined locations (Part B). Finally, it provides a list of impacts that development proposals for tall buildings must address (Part C).

7.35 The recent High Court judgement in *R (on the application of London Borough of Hillingdon) v Mayor of London [2021] EWHC 3387 (Admin)* confirmed that Parts A and B of Policy D9 are not 'gateway' policies, and do not need to be satisfied before a scheme can be assessed against the qualitative criteria in Part C. This is on the basis that Policy D9 does not alter the fundamental legal principle that a determination must be made in accordance with the Development Plan unless material considerations indicate otherwise. The result of this judgement is that the fact that tall building proposals are located outside areas defined as being suitable for such buildings in Development Plans does not automatically mean they will be unacceptable. The proposal should be considered against the Development Plan and other material considerations, and whether or not to grant consent in light of non-compliance with Parts A and B of policy D9 remains a matter of planning judgement.

7.36 Policy BE1 of the HLP Part 1 and Policy DMHB 10 of the HLP Part 2 set out the local policy for 'high buildings and structures', which are defined as '*those that are substantially taller than their surroundings, causing a significant change to the skyline*' (para. 5.32). It is the Applicant's position that, applying this definition, none of the proposed buildings on the Site can be considered a 'high building or structure' for the following reasons:

- The existing building is substantially taller than its surroundings and is already a 'high building' according to the definition in the HLP. During determination of the adjacent aparthotel application, the Hyatt hotel was used as a benchmark in order to determine whether the proposed 15-storey building was '*substantially higher than its surroundings*'.
- Due to the removal of the existing plant room at thirteenth floor level and the rationalisation of floor-to-ceiling heights, the extension to the existing building increases the overall height of the building by only 2 metres overall and the full-height extension is of a modest depth. It is therefore argued that it does not result in a '*significant change to the skyline*'.
- The new buildings proposed on the Site (6-8 storeys) are much lower than the existing Hyatt hotel and are not therefore '*substantially taller than their surroundings*'.

7.37 Notwithstanding the above, and noting that the GLA have highlighted the relevance of Part C of Policy D9 in their pre-application advice, should it be the case that LBH and the GLA consider that the Proposed Development constitutes the development of 'high buildings and structures', then the result of the Master Brewer judgement is that it is necessary for the applicant to demonstrate that there are material considerations justifying the grant of consent, and to demonstrate that the proposed tall building does not cause adverse impacts in respect of the criteria listed in Part C of Policy D9.

7.38 The below provides an assessment of the Proposed Development against the criteria in Part C of Policy D9, which are subdivided into visual, functional, environmental and cumulative impacts. Policy DMHB10 of the HLP Part 2 follows a similar approach to Part C of Policy D9 in setting out a number of criteria that proposals for high buildings should satisfy. These criteria are broadly analogous to the criteria in Policy D9.

Visual impact

- The proposal would have no adverse impacts (and, in some instances, would have beneficial impacts) on long-range, mid-range and immediate views, as demonstrated by the TVIA submitted with this application.
- The building is of a high architectural quality with a simple, elegant form, and uses materials of an exemplary standard, as set out in the Design and Access Statement submitted with this application.

- The proposal is not within or nearby a Conservation Area, nor in the vicinity of any listed buildings, and has no impact on any heritage assets.
- The scheme is not expected to provide any glare issues with regards to the facade and there are no known sensitive locations nearby the site that are susceptible to the dangers of glare. To reduce solar glare and solar gain the window glass can be specified as low emissivity, which will be explored further at the detailed design stage. To limit reflection, the solar PV panels will be constructed from dark, light-absorbing materials and covered with an anti-reflective coating.

Functional impact

- The internal and external design of the building and its emergency exit routes have been designed to ensure the safety of all occupants. Further detail is set out in the various documents submitted with this application, in particular the Fire Statement prepared by One Stop Fire and the Secured by Design commentary contained within the Design and Access Statement.
- Careful thought has been given to the on-site servicing arrangements and their impact upon the public realm. The Proposed Development creates new areas of public space along the Uxbridge Road and Springfield Road frontages and removes two vehicular crossovers, representing an enhancement on the current situation. Further detail can be found in the Landscape Strategy contained in the Design and Access Statement.
- The capacity of the area and its transport network is capable of accommodating the quantum of development proposed, subject to appropriate mitigation. Further detail is set out within the Transport Statement and associated documents submitted with this application.
- The jobs, services, facilities and economic activity provided by the development and the regeneration potential this might provide has informed the design, particularly in relation to the proposed industrial space, which will revitalise this part of the SIL and act as a catalyst for further change (as set out elsewhere in this Planning Statement).
- The Proposed Development is not substantially higher than the existing buildings on the Site and is therefore unlikely to interfere with aviation activity (noting that the relevant airport safeguarding authorities will be consulted on this application). This proposal is submitted with a TV and Radio Reception Impact Assessment which confirms that the Proposed Development would not unreasonably interfere with telecommunication.

Environmental Impact

- The Proposed Development will not impact upon the wind, daylight, sunlight penetration and temperature conditions around the buildings nor compromise comfort and the enjoyment of streets and open spaces around the building. Please refer to the Wind and Microclimate Assessment submitted with this application for further details.

Cumulative impact

- The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in the area have been considered in the preparation of this application. In particular, regard has been had to the proposed scheme at 15-17 Uxbridge Road, which is the only proposal likely to generate a material cumulative impact in functional or environmental terms.
- The cumulative visual impacts of both the adjacent planned scheme and wider developments within the area have been assessed within the TVIA. As set out elsewhere in this statement, there are no adverse visual impacts caused by the proposal, either individually or cumulatively.

7.39 Notwithstanding the fact that the Proposed Development meets all criteria in Policies D9 and DHMB10, it is an important material consideration that the existing building on the Site is already tall. Although the building is being extended on the north elevation and at roof level, in comparison to the overall size of the existing building those extensions are modest. The majority of the 'impact' that the building has is already there, on site. This should be taken into account when considering any technical non-compliance with Parts A and B of policy D9 (and notwithstanding the Applicant's contention that the buildings on the site do not meet the definition of a 'high building or structure').

7.40 In summary, the Applicant considers that the Proposed Development is not a 'tall building' when considered against the definition in the HLP. However, should it be concluded that the Proposed Development meets the definition of a 'high building or structure' and therefore does not meet the locational requirement of London Plan Policy D9, then this application has demonstrated that the proposal meets all the assessment criteria set out in Part C and, as set out above, the fact that there is an existing tall building on the Site is a material consideration carrying considerable weight (as are the benefits associated with this development, as set out elsewhere in this Statement). Having regard to the above considerations and the *ratio* of the aforementioned High Court decision, tall buildings on the Site can be considered acceptable.

Inclusive design

7.41 Policy D5 of the London Plan provides that development proposals should achieve the highest standards of accessible and inclusive design. Policy E10 (Part H) stipulates that development proposals for serviced accommodation should ensure that 10% of new bedrooms are wheelchair accessible (where they are compliant with Fig. 52 of BS8300). This is reflected in Policy DME6 of the HLP Part 2, which adds that these rooms should be located along accessible routes, close to lifts, and be situated so that they have equal access to views enjoyed from standard bedrooms.

7.42 The proposed scheme has been designed so that it is accessible for all. All entry points are at grade and a single level is used throughout the retained and proposed buildings. All external and internal doors are Part M compliant and accessible bedrooms are located as close as possible to the lift cores (in some cases directly adjacent). A total of 14 accessible parking bays are provided in the closest proximity possible to the secondary entrance. All amenity spaces are wheelchair accessible, and accessible hotel rooms are provided up to level 7 (the highest level of new-build development). A total of 23 new-build rooms are provided to the relevant standard.

7.43 Further details of how the scheme has been designed to be accessible for all can be found in Section 6.4 of the Design and Access Statement submitted with this application.

Impact on amenity

7.44 Policy BE1 of the HLP (Part 1) and Policy DHMB11 of the HLP Part 2 provides that the Council will require all new development to seek to protect the amenity of surrounding land and buildings, particularly residential properties, and particularly in terms of daylight and sunlight. Policy DME5 of the HLP Part 2, which is specific to hotels, sets out that development should not cause any adverse impact on the amenity of adjoining occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.

Daylight and sunlight

7.45 This application is submitted with a Daylight and Sunlight Assessment prepared by Point 2. This assesses the changes in daylight and sunlight to neighbouring residential properties by reference

to the guidelines set out in the 2022 Building Research Establishment (BRE) Report '*Site layout planning for daylight and sunlight - A guide to good practice*', which is widely used by planning authorities as the means by which to judge the effects of a scheme on neighbouring amenity in daylight and sunlight terms. The BRE Guidelines state that the guidance should be interpreted flexibly, having regard to the context within which a scheme is located.

7.46 In summary, the assessment concludes that the Proposed Development will give rise to some effects on the daylight levels to a small number of properties located opposite the Site on Uxbridge Road. However, the levels of retained daylight will generally remain good for an urban location. There will be no adverse sunlight amenity impacts to neighbours. Whilst the internal courtyard spaces within the Proposed Development will be overshadowed to some degree, the proposed amenity areas at rooftop level will receive good levels of direct sunlight such that occupiers of the hotel will benefit from having access to some well-sunlit external amenity.

Outlook

7.47 The new buildings are located approximately 35 metres away from the nearest residential properties on the opposite side of Uxbridge Road. The proposed development therefore has no impact on outlook from any residential properties.

Privacy

7.48 The Proposed Development is located further than 18 metres away from the nearest residential properties (18 metres being the widely-used 'rule of thumb' for judging whether there would be a loss of privacy), and is located across a highway. There would be no loss of privacy caused to any residential properties within the vicinity of the Site.

Noise, lighting and emissions

7.49 The nearest noise-sensitive receptors to the Site are the residential properties opposite, which are located a considerable distance away from the Proposed Development across a busy, street lit road. The Proposed Development is therefore unlikely to have any noticeable impacts upon these residential properties in terms of noise, lighting or emissions. Notwithstanding the above, all 'noisy' activities associated with the light industrial uses on the Site (such as delivery and servicing) will take place at the rear of the Site, away from the Uxbridge Road frontage. All plant and building services equipment will be contained within the building or, where necessary to locate it externally, be housed in a suitable acoustic enclosure.

Transport

7.50 Para. 104 of the NPPF provides that transport issues should be considered from the earliest stages of development proposals so that, *inter alia*, the potential impacts of development on transport networks can be addressed and opportunities to promote walking, cycling and public transport use are identified and pursued. Para. 11 provides that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

7.51 The London Plan sets out a number of strategic transport aims including that development should promote sustainable modes of travel and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated (Policy T1).

7.52 Full details of how the proposal complies with the relevant planning policy on transport can be found in the Transport Assessment, Travel Plan and Delivery and Servicing Plan prepared by Caneparo Associates. By way of summary, the key planning considerations are set out below.

Cycle Parking

7.53 Policy T5 sets out a number of criteria designed to remove barriers to cycling, including the provision of levels of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking in accordance with the minimum standards set out in Table 10.2 and Figure 10.3 of the London Plan.

7.54 The Proposed Development provides 95 cycle parking spaces, which is well in excess of that required by the London Plan. Separate cycle parking is provided for hotel guests and hotel staff, and this will be separate from the light industrial uses so that each user group is provided with an attractive and accessible cycle store. The proposed hotel will be complemented with a dedicated cycle hire facility offered to guests, which will be privately operated by the Applicant, with 20 cycles on offer to guests to borrow for time-defined periods.

Vehicle parking

7.55 Policy T6 of the London Plan provides 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'). Policy T6.4 is specific to hotels and prescribes 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, with the aim of improving public transport reliability and reducing congestion and levels of reduce congestion and traffic levels. The London Plan makes it clear that the absence of local on-street parking controls should not be a barrier to new development.

7.56 In terms of the hotel use, the proposal includes 14 accessible bays and 18 standard bays with a dedicated, covered vehicle setting down point to enable the setting down and picking up of guests by car. The development also seeks to provide 7 van car parking bays (including 1 accessible space and 1 car club bay) for the light industrial space. In recognition of the fact that the Proposed Development results in a reduction in car parking spaces in conjunction with an uplift in floorspace (and in response to pre-application advice from LBH), the proposed development is supported by a comprehensive package of transport measures to provide realistic and attractive alternatives to car travel, which aligns with prevailing planning policy objectives at national, London-wide and local level.

7.57 This package of measures has been developed to directly respond to pre-application feedback received by LBH (the level of car parking proposed is in excess of what is advocated and deemed necessary by the GLA). The proposed development will effectively operate as a car-free scheme, where all future guests and commercial occupiers will be aware of the limited car parking in advance of their arrival and spaces being required to be pre-booked. However, some limited car parking is provided to respond to LBH pre-application advice, and is supported by a package of measures which further improves access to sustainable transport modes and ensure that travelling by private car is unnecessary.

7.58 The proposed measures are set out in detail in the Transport Statement and are to be secured via conditions and/or Section 106 obligations, as appropriate. In summary, they are:

- A dedicated minibus service operated to shuttle guests between the Site and public transport services to overcome any need to travel by car, offering 2 minibuses with a service every 10- 12 minutes;
- The provision of a shared van for business use (akin to a Car Club vehicle) that is exclusive to the development to reduce vehicle ownership whilst ensuring access to a vehicle for business purposes is permitted to meet operational requirements;
- The provision of cycle parking above the minimum London Plan standards for the hotel use, incorporating a dedicated private cycle hire scheme for hotel guests;
- A commitment to contribute towards providing LBH public cycle hire facilities;
- A financial contribution towards local Active Travel improvements to further improve the attractiveness of walking and cycling;
- Dedicated servicing and delivery space for the hotel and light industrial elements which is appropriately sized, independently accessible and separate from one another to ensure the efficient operational management of the Site.

7.59 Given the measures set out above and within the Transport Assessment, the Proposed Development will not have an unacceptable impact in terms of parking on adjoining streets, and therefore meets the key test in the NPPF that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. It should also be noted that, if considered necessary, the Applicant is willing to make a financial contribution towards a future Controlled Parking Zone (CPZ) review.

Deliveries and Servicing

7.60 Policy T7 of the London Plan requires adequate space for servicing, storage and deliveries to be provided off-street, with on-street loading bays only used where this is not possible. Table 1 of the HLP Part 2 provides that development layouts should allow all vehicles to load/unload and enter and leave the site in a forward gear.

7.61 Servicing and deliveries for both the hotel and light industrial element of the proposal will be undertaken on-site, via the dedicated loading areas provided for each use. The proposed arrangement for servicing enables all activity to be undertaken within the Site, clear of the public highway, and in a manner that accommodates all vehicles entering and exiting in forward gear. Further details, including swept path vehicle analysis, can be found in the Delivery and Servicing Plan submitted with this application.

Sustainability and energy

7.62 The Proposed Development aims to achieve the highest standards of sustainability during both the construction and operational phases. In line with Whole Life Carbon (WLC) principles as set out in the London Plan, the starting point for the sustainability strategy is the retention of and upgrade to the existing hotel, resulting in significant embodied carbon savings when compared with comprehensive redevelopment. The new buildings are designed to be as sustainable as possible. A BREEAM pre-assessment has been carried out and demonstrates that the project has a current targeted BREEAM rating of 'Very Good' with the potential to achieve a BREEAM rating of 'Excellent'. These sustainable construction objectives are supported by a transport strategy which is focussed on significantly reducing car travel and a landscaping strategy underpinned by urban greening principles (addressed elsewhere in this Planning Statement).

Carbon emissions

7.63 Policy SI2 of the London Plan requires major development to be net zero carbon, and requires development proposals to include a detailed energy strategy to demonstrate how the zero-carbon target will be met. A minimum on-site reduction in carbon emissions of at least 35% beyond Building Regulations is required for major development, with non-residential development required to achieve 15% through energy efficiency measures. Where the target cannot be fully achieved on-site, any shortfall should be provided through a cash-in-lieu contribution to the borough's carbon offset fund. Policy DME3 of the HLP Part 2 requires all major developments to be designed to be able to connect to a Decentralised Energy Network (DEN).

7.64 An Energy and Sustainability Statement (including an Overheating Assessment) has been prepared by Love Design Studio in support of this application. In summary, the following measures are adopted to reduce carbon emissions:

- The new development will be fossil-fuel free and will include a site wide hot water distribution network supplied by energy-efficient heat pumps;
- The new basement heat plant room will have the provision for connecting to a future district heat network, should this be brought forward in the local area;
- The plant room allows space for future heat exchangers to exploit possibility of a future connection to data centres in the local area where they may be looking at cost-effective ways to 'dump their heat', with the option for including Waste Water Heat Recovery Systems (WWHRS) to be explored at the detailed design stage;
- The scheme adopts a fabric-first and passive design approach to reduce energy demand for space heating and active cooling. Each hotel room will have a Mechanical Ventilation Heat Recovery (MVHR) unit to provide fresh air efficiently in winter and the option for natural ventilation;
- Solar panels are provided on the roof, where feasible;
- The incubator workspaces will be provided with capped off services from the hot water network but will also have the flexibility to adopt their own heating, ventilation and cooling solutions depending on the tenant's needs and preferences.

7.65 The proposed development would achieve a 74% reduction in regulated CO² emissions when measured against the relevant Part L baseline (2013), with the potential for further savings if WWHRS are explored. The shortfall will be covered by a carbon offset payment, to be secured via Section 106 agreement.

Whole Lifecycle Carbon Assessment

7.66 Policy SI2 of the London Plan provides that proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA) and demonstrate actions taken to reduce life-cycle carbon emissions. Guidance is also contained in the Whole Life Cycle Carbon Assessments LPG (2022).

7.67 This scheme is submitted with a WLCA prepared by Love Design Studio which demonstrates that in respect of whole life cycle carbon, the scheme is outperforming the GLA aspirational targets and achieving some of the aspirational targets set by LETI and RIBA. In terms of embodied carbon, the scheme is outperforming the GLA aspirational targets, with significant savings having been made in the early design stages through careful material specification and by designing to retain and refurbish the existing building on site, rather than demolishing and rebuilding.

Circular economy

7.68 Policy SI7 of the London Plan states that referable applications should promote circular economy outcomes and aim to be net zero-waste, and that a Circular Economy Statement (CES) should be submitted with referable applications. The policy is supported by the Circular Economy Statements LPG (2022). A CES has been prepared by Love Design Studio and is submitted with this application, setting out how the scheme will ensure adherence to circular economy principles.

Trees, landscaping and biodiversity

7.69 Policy G5 of the London Plan requires major development proposals to contribute to the urban greening of London by incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage, and sets a target Urban Greening Factor (UGF) score of 0.3 for commercial developments. Policy G6 provides that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. These aims are reflected in Policies DMEI1, DMEI7 and DMHB14 of the HLP Part 2.

7.70 An Ecological Appraisal prepared by Tim Moya Associates has been submitted with this application. This confirms that the existing site is of very little ecological value. The Site is in reasonably close proximity to the Yeading Brook, Minet Country Park and Hitherbroom Park SINC and London's Canals SINC, however due to the relatively small footprint and localised scale of the development, there is unlikely to be a detrimental impact on these or any other non-statutory designated sites. The report recommends several ecologic enhancements, such as bird and bat boxes, which can be considered at detailed design stage and secured via condition if considered necessary.

7.71 A Tree Survey and Arboricultural Impact Assessment prepared by Hayden's Arboricultural Consultants has been submitted with this application which has identified 18 trees on the Site (16 Category C and two Category U). It is proposed to remove all 18 trees on the Site in order to facilitate the development. A comprehensive landscaping strategy is proposed for the Site, as set out in the Landscaping Statement submitted with this application (contained within the Design and Access Statement). The key landscaping features of the scheme are set out below:

- The planting of 8 semi-mature trees along Uxbridge Road;
- The planting of further tree groupings and planting beds along Springfield Road;
- Two fully landscaped courtyard gardens within the development incorporating vertical greening;
- Four 'biosolar' roofs (solar panels fixed above extensive green roof);
- A smaller area of green roof in the southeastern corner of the development at first floor level.

7.72 The Proposed Development has an Urban Greening Factor score of 0.389, which is comfortably in excess of the London Plan target of 0.3. Overall, the proposal represents a significant improvement on the existing site in terms of landscaping, ecology and biodiversity and results in significant urban greening, particularly in relation to the public realm.

Flood risk and surface water management

7.73 Policy SI12 of the London Plan seeks to ensure that flood risk across London is minimised and mitigated. Policy SI13 requires development proposals to utilise sustainable urban drainage systems (SuDS) and aim to achieve greenfield run-off rates. Surface water run-off should be

managed as close to its source as possible. This is reflected in Policies EM6 of the HLP Part 1 and Policies DME9 and DME10 the HLP Part 2.

7.74 The site falls within Flood Zone 1, denoting a low probability of flooding from rivers and the sea. The existing Site is entirely impermeable, and a small area of the car park has a medium risk of surface water flooding. The Proposed Development will incorporate a range of SuDS, including 'blue roofs' (where surface water from some blocks would be conveyed to the blue roof before discharging into the attenuation tank), green roofs, soft landscaping and permeable paving. Overall, the proposed scheme will provide 740m² of permeable and 1,805m² of semipermeable surfaces, and will substantially reduce the risk of surface water flooding to the Site.

7.75 For further detail, please refer to the Flood Risk Assessment and Surface Water Management Strategy prepared by Engineeria and submitted with this application.

Water Cycle Strategy

7.76 Policy SI5 of the London Plan seeks to conserve water supplies and resources and requires development proposals to minimise the use of mains water. A Water Cycle Strategy has been prepared by Engineeria in support of this application which explains how flood management, drainage measures and water efficiency can be maximised and implemented across the scheme. Measures include SuDS (as set out above), smart metering, leak detection systems and highly specified fittings. The development will re-use both rainwater and grey water, thus making efficient use of water resources.

Air quality

7.77 Policy SI1 of the London Plan and policies EM8 and DME14 of HLP Part 1 seek to safeguard and improve air quality. Development proposals should, as a minimum, be at least 'air quality neutral' and include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new. Developments should actively contribute towards the improvement of air quality, especially within Air Quality Management Areas.

7.78 The application is accompanied by an Air Quality Assessment which demonstrates that the development will not have an adverse impact upon local air quality and is 'Air Quality Neutral'. Pollutant concentrations at the ground-floor building façades fall within the London Council's exposure category APEC-A and therefore mitigation is not required to protect future occupants from poor air quality.

Fire safety

7.79 Policy D12 of the London Plan provides that all development proposals must achieve the highest standards of fire safety and requires all major development proposals to be submitted with a Fire Statement, which is an independent fire strategy produced by a third party, suitably qualified assessor. Policy D5 (Part B(5)) of the London Plan requires developments that include a lift core to include at least one evacuation lift.

7.80 A Fire Statement prepared by One Stop Fire has been submitted with this planning application which outlines how the development complies with the London Plan and associated guidance (including the draft Safety LPG), including the provision of evacuation lifts. The design of the Proposed Development has, at all stages, been developed in accordance with the principles contained in the Fire Strategy.

Waste and recycling

7.81 Policy DMHB11 of the HLP Part 2 requires development proposals to make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. The bin store for the Proposed Development is located in the southwest corner of the ground floor and provides space for 38 eurobins (1100l). The store is shared between both building uses, and a suitable waste management strategy will be adopted for the clear separation of waste products.

7.82 Waste collection will take place at the rear of the Site, using the servicing locations for the hotel and light industrial units, which have been designed to be able to accommodate a large refuse vehicle. Access to the bin store is provided through a set of double doors to the south. Refuse vehicle collectors will receive a security fob allowing them direct access. For further detail, please refer to the Delivery and Servicing Plan submitted with this application.

Other relevant planning considerations

7.83 LBH's Land Contamination Officer has advised, during the pre-application process, that the Site is within 120 metres of a historic landfill site and may previously have been used as a petrol filling station. A ground contamination Desktop Study and Preliminary Risk Assessment Report has therefore been submitted with this application.

7.84 Given the proposals to excavate and construct a basement to the north of the Site to house plant and equipment, a Basement Impact Assessment (BIA) has been provided with this application. The report concludes that any risks posed by the excavation of the basement can be mitigated by appropriate design and standard construction practice, and that the works can be undertaken safely and without any noticeable effect on groundwater flow.

7.85 The Applicant has carefully considered the impacts of the construction process on nearby residential properties and the surrounding road network and how these impacts can be mitigated. An outline Construction Logistics Plan and Demolition and Construction Management Plan are submitted with this application, and it is expected that updated versions of these documents will be secured via planning condition.

7.86 A Utilities Statement prepared by Woodcote Power has been submitted with this planning application and sets out the existing and anticipated utilities infrastructure required to support the proposed development. The report recognises that the electrical distribution network in West London is highly constrained, as highlighted in the recent GLA paper (July 2022) which indicated that new applicants may have to wait several years to receive new electricity connections. An application for supply to the Proposed Development has already been made.

8.0 PLANNING OBLIGATIONS

Section 106 Heads of Terms

8.1 In addition to the inherent planning and regeneration benefits of the Proposed Development as set out in this Planning Statement, it is anticipated that an appropriate package of site-specific Section 106 contributions will be negotiated and agreed with LBH in line with the Planning Obligations SPD (2014). These must accord with the statutory tests contained in Regulation 122 of the Community Infrastructure Levy Regulations (2010) and should have regard to the overall viability of the development proposals.

8.2 At this stage, it is anticipated that the Section 106 is likely to include the following standard Heads of Terms:

- The provision of an Employment Strategy and Construction Training (via a financial contribution or in-kind training);
- The submission and approval of a Green Travel Plan, including details of the proposed transport mitigation measures, targets for sustainable travel arrangements, effective measures for the ongoing monitoring of the Travel Plan and a commitment to implementing the Travel Plan objectives (including payment of a £20,000 Travel Plan bond);
- A financial contribution towards Active Travel improvements locally to further improve the attraction of walking and cycling;
- A financial contribution towards a future Controlled Parking Zone review for the local area;
- A Section 278 agreement to implement the proposed off-site highways works on Uxbridge Road and Springfield Road;
- A financial contribution to offset carbon emissions, charged at a rate of £95 per tonne over a 30-year period;
- A Project Management & Monitoring Fee equal to 5% of the total cash contributions secured from the scheme to enable the management and monitoring of the resulting agreement.

8.3 In addition to the planning obligations generated by planning policy requirements and the need for mitigation, the Proposed Development is accompanied by a bespoke Community Investment Programme, which establishes a suite of initiatives and opportunities within the immediate vicinity, working with local partners to maximise the public benefits offered by the development proposals. It is intended that the CIP is incorporated into the Section 106 agreement in order to secure long-term social value objectives. This is an approach that has been applied in relation to other recent projects in Hillingdon, where a CIP has weighed in favour of the scheme.

8.4 The CIP is intended to be a document which is bespoke to the Proposed Development and its immediate vicinity, and therefore the precise content is to be discussed and agreed with LBH during the application process. However, at this stage it is proposed to offer the following initiatives which have been developed in collaboration with local businesses:

- A partnership programme with Uxbridge College involving hospitality apprenticeships for students to work in the hotel whilst they train for their qualifications, as well as other initiatives such as pop-up spaces in the hotel for trainee hairdressers/beauticians;
- An accelerator programme for students and start-up businesses twice a year in the industrial incubator space. This will be held at the hotel and jointly funded by the Applicant and Brunel University;
- A partnership with Praxis, a charity providing support for refugees in London, to provide emergency accommodation in the hotel;

- A quarterly event for hotel guests and local residents at Minet Park cycling clubhouse, focusing on cycling safety and management;
- Free use of spaces for local community groups in the hotel each month;
- A communal evening event for local businesses and community groups to be funded and hosted by the operator at the hotel once every 6 months; and
- A programme of charitable donations to local charities, including a partnership with the Hayes YMCA SPG to fund a youth crime prevention programme in Hillingdon.

8.5 The community Investment Programme demonstrates a commitment on behalf of the Applicant to secure tangible long-term benefits from the scheme and generate substantial social value over the life of the development. It should be viewed as a significant benefit of the Proposed Development.

8.6 The Section 106 agreement should also contain provisions governing estate management of the publicly accessible areas to be provided on-site, including that no third party rights over the site will accrue during the operational phase of the development. It should also provide for closure of the managed public realm in certain specified circumstances (for example for maintenance, emergency, refurbishment/fitout, events, to preserve property rights and prevent third party rights from accruing).

Community Infrastructure Levy (CIL)

8.7 The Mayoral Community Infrastructure Levy (MCIL 2) charging schedule was adopted on 01 April 2019. LBH is located within Band 2 which is charged at £60 per m² for all uses except health and education. LBH's CIL Charging Schedule came into effect in July 2014. For hotels (C1) the CIL rate is £40 per m². Light industrial uses are charged at a nil rate. The relevant CIL information has been supplied with this application.

9.0 CONCLUSIONS

- 9.1 The Proposed Development is located within an Opportunity Area and seeks to make the best use of land, generating a number of benefits from an underutilised site. The proposal results in the introduction of 1,318m² (GIA) of high-quality light industrial space which meets an identified need for smaller business space and enhances the competitiveness of the SIL. The development is of a high-quality design, is accessible for all, creates new public realm and makes a significant contribution to urban greening. The Proposed Development encourages sustainable modes of transport and is environmentally sustainable. Overall, it is consistent with planning policy objectives at national, London-wide and local level.
- 9.2 The Proposed Development will benefit the local community, bring investment to the area and secure positive, long-term economic, social and environmental impacts. In addition to the benefits which are intrinsic to the scheme, the Applicant will seek to deliver several additional benefits via a bespoke Community Investment Programme, demonstrating a long-term commitment to supporting the local community and generating social value.
- 9.3 Detailed impact assessments have been carried out during the preparation of this planning application and, where impacts have been identified, suitable mitigation has been provided. Overall, having regard to the Development Plan and all other material considerations, including the public benefits of the scheme, it is considered that planning permission should be granted.

DP9 Limited

September 2022