

Capital Place, 120 Bath Road, Harlington, Hayes, UB3 5AN: Parking Provision

Ref: NM/HC/ITL210199-006b
Date: 19 June 2026

SECTION 1 Introduction

1.1 Overview

- 1.1.1 This note (TN) has been prepared on behalf of the Applicant, Toyoko Inn Co., Ltd, to present justification for the proposed parking provision at Toyoko Inn; a proposed new 206-bed hotel at 120 Bath Road, Harlington (the site).

1.2 Executive Summary

- 1.2.1 The existing office site provides 199 car parking spaces. At the time of application submission (*application reference: 36728/APP/2025/3224*), the proposal demonstrated a reduction in the total number of car parking spaces to 152 on-site car parking spaces.
- 1.2.2 During the pre-application process, this proposed car parking reduction and resulting provision was deemed acceptable by London Borough of Hillingdon (LBH), as stated in the pre-application advice response, dated 23 September 2025 (**Appendix A**):

"After reviewing the assessment it is concluded that the proposed car parking reduction and resulting provision is acceptable, however the spaces must be exclusively for hotel guests and staff."

- 1.2.3 Since the application submission, LBH Highways officers have requested further justification for the number of car parking spaces proposed. As such, a further review of the development's car parking space requirement has been undertaken and identified an operational need for 147 car parking spaces. However, the Applicant has recognised the local authority's position that a further reduction in car parking on site is necessary, to secure both sustainable travel provision and to enable further land to be given over to landscaping.

- 1.2.4 In light of this, the revised total parking provision proposed at the site is 130 car parking spaces. This is a reduction of 69 spaces from the existing provision on site and a further reduction of 22 spaces from that presented with the application and deemed acceptable during the pre-application process.

1.3 Structure of Note

- 1.3.1 The remainder of this TN is as follows:

- **Section 2** - sets out how the proposed parking requirement has been determined.
- **Section 3** - presents the summary and conclusions of the parking review and proposals.

SECTION 2 Parking Justification

2.1 Overview

- 2.1.1 The following data and methodology have been used to derive a justified proposed total parking provision for the development:

Guest Parking

- Origin-destination analysis of the future guest composition to generate an anticipated guest car driver modal split (84%) – **Appendix B**.
- Application of the anticipated guest car driver modal split (84%) to the relevant guest composition profiles, which could access the site via car (82%) – **Appendix C**.
- Application of the combined anticipated guest car modal split to the relevant guest composition profiles, which could access the site via car (69%) to the total bedroom numbers (206) to generate a potential guest parking requirements of c.141 spaces.

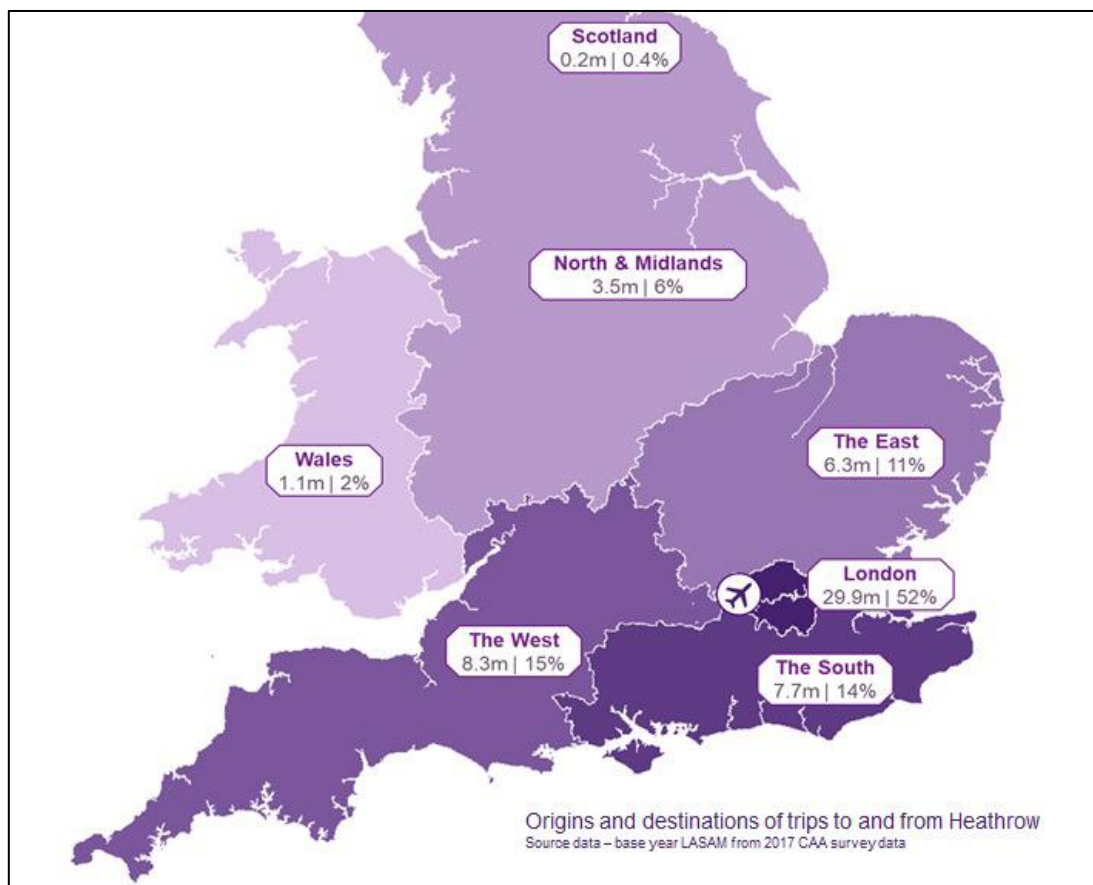
Staff Parking

- Setting an ambitious staff travel plan car driver modal target (10%). Based on anticipated hotel staff numbers (60), this generates an operational staff parking requirements of c.6 spaces.

2.2 Guest Parking

Car Driver Modal Split

- 2.2.1 The distribution of guest origin-destination trips has been derived with reference to the Heathrow Surface Access Strategy (SAS), given the development's location and inherent operational link to the airport and its customers, as presented at **Image 2.1**.

Image 2.1: Origins and Destinations of Trips to and from Heathrow

Source: Heathrow Access Strategy (2022)

2.2.2 The SAS survey data suggests origin-destination trips are distributed between 7 regions within Great Britain. However, the distribution of the hotel guest origin-destination trips is anticipated to vary from those solely accessing the airport itself. Therefore, a reasonable 50% reduction in origin-destination trips to / from London has been applied and proportionally re-distributed to the other 6 regions to reflect:

- A reduced tendency for London residents to require a hotel in a location near to their home, including before / after a flight.
- The anticipated guest composition profiles, with an increased tendency to require a hotel in a location adjacent to the airport, rather than travelling into London for accommodation.

2.2.3 The SAS survey data and proposed hotel origin-destination trip distributions are summarised in **Table 2.1**.

Table 2.1: Origin-Destination Trip Distribution

	London	The South	The West	The East	Wales	North & Midlands	Scotland	Total
Heathrow Airport Origin-Destination Trip Distribution								
Percentage of Total Trips	52.2%	13.5%	14.6%	11.1%	1.9%	6.1%	0.4%	100%
No. of Trips (million)	29.9	7.7	8.3	6.3	1.1	3.5	0.2	57.0
Proposed Hotel Origin-Destination Trip Distribution								
Percentage of Total Trips	26.2%	21.0%	22.6%	17.1%	3.0%	9.5%	0.5%	100%

Source: Heathrow Access Strategy (2022) and consultant's calculations

2.2.4 The Google Maps journey planner tool has been used to assess the driving and public transport journey times between the site and the top 5 locations (by total population) within each of the 7 regions – 35 locations in total. The tool has been used to compare driving and public transport journey times from the 35 origin locations to the site, using an 'arrive by' time of 15:00 midweek to reflect a typical check-in time.

2.2.5 Of the 35 locations, 25 journeys are quicker via car and 10 are quicker via public transport. However, when applying weighted population figures to the results, 84% of trips would be quicker via car and 16% of trips would be quicker via public transport. This analysis is summarised at **Table 2.2**, and the full data is presented at **Appendix B¹**.

Table 2.2: Weighted Origin-Destination Trip Distribution by Mode of Travel

	London	The South	The West	The East	Wales	North & Midlands	Scotland	Total
Percentage of Total Trips Quicker via Driving	15.6%	21.0%	22.6%	17.1%	1.6%	6.4%	0.0%	84%
Percentage of Total Trips Quicker via Public Transport	10.7%	0.0%	0.0%	0.0%	1.4%	3.1%	0.5%	16%

Source: Consultants Calculations

¹ An online version of the full origin-destination analysis can be provided upon request.

2.2.6 On the basis journey time is a key determining factor for journey modal choice, an 84% guest car modal split is justified and has been utilised. Furthermore, the 'arrive by' time of 15:00 midweek allows for greater use by public transport, owing to greater levels of service during the day (whereas earlier or later journey times may favour greater car usage due to less frequent public transport connections).

Guest Composition Profile and Parking Requirement

2.2.7 The anticipated guest composition profile of the hotel, based on interview data supplied by the Applicant is provided at **Appendix C**. This data suggests that 82% of guests could travel to the site via car, as summarised in **Table 2.3**. The 18% of guests that would not have the option to travel to the site via car include:

- Group tourists, who will access the site via tour bus / coach.
- Transit passengers and delayed or cancelled flight passengers, whose travel will be limited to between the site and Heathrow airport via shuttle bus or taxi, and therefore access via car is an unrealistic option.

2.2.8 The anticipated 84% guest car modal split, as detailed in **Table 2.2**, has been applied to the 82% of guests that could travel to the site via car, resulting in 69% of bedrooms having a potential guest car parking requirement, as summarised in **Table 2.3**.

Table 2.3: Guest Composition and Parking Requirement Summary

	% of Rooms	Equivalent Rooms	Guests Travel via Car	Parking Requirement
Business travellers	35%	72	84%	61
Conference attendees	15%	31	84%	26
Long-stay business guests	10%	21	84%	17
Individual tourists	18%	36	84%	30
Group tourists	8%	15	0%	0
Transit passengers	8%	16	0%	0
Early flight passengers	2%	4	84%	3
Late flight passengers	2%	4	84%	3
Delayed or cancelled flight passengers	3%	6	0%	0
Total				

	% of Rooms	Equivalent Rooms	Guests Travel via Car	Parking Requirement
Total Guests with Option to Travel via Car	82%	168	84%	141
Total Guests with No Travel via Car	18%	38	0%	-
Total	100%	206	-	141

Source: Toyoko Inn Ltd and Consultants Calculations

2.2.9 Table 2.3 details that a 206 bedroom hotel could result in a guest car parking requirement of c.141 spaces.

2.3 Staff Parking

2.3.1 The proposed hotel development is anticipated to have an operational requirement of c.60 total staff. It is proposed to set an ambitious 10% staff car driver modal split travel plan target, resulting in an operational staff parking requirement of c.6 spaces.

2.3.2 As detailed in the Heathrow SAS, there is a colleague single-occupancy-car mode share target of 57%. On this basis, the 60 hotel staff could have a parking requirement of 34 staff spaces.

2.3.3 As detailed in the Travel Plan Statement (*report reference: ITL210199-003b*), the indicative baseline modal split for the site, derived from the 2011 Census Journey to Work (JtW) data for the Hillingdon 031 and 032 Middle Super Output Areas (MSOA) place of work, which cover the site location and neighbouring workplaces / hotels is 68% of staff travelling via car. On this basis, the 60 hotel staff could have a parking requirement of 41 staff spaces.

2.3.4 It has previously been demonstrated in the Transport Statement (*report reference: ITL210199-002b*) and Travel Plan Statement (*report reference: ITL210199-003b*), prepared to accompany the application submission, that there are genuine opportunities for staff to travel via non-car modes. Furthermore, staff travel presents the greatest opportunity to influence travel to / from the site. Therefore, setting an ambitious 10% staff car driver modal split travel plan target is justified.

2.3.5 It has therefore been demonstrated that providing c.6 spaces for operational staff parking aligns with setting an ambitious staff travel plan car driver modal target, whilst also satisfying operational requirements.

SECTION 3 **Summary and Conclusion**

3.1 **Summary**

- 3.1.1 The proposal comprises a new 206-bed hotel at 120 Bath Road, Harlington (the site).
- 3.1.2 The existing office site provides 199 car parking spaces. At the time of application submission (*application reference: 36728/APP/2025/3224*), the proposal demonstrated a reduction in the total number of car parking spaces to 152 on-site car parking spaces.
- 3.1.3 Since the application submission, a review of the development's parking proposals is required based on the consultation comments arising from the application's review, which has differed from the opinion / comments raised by LBH officers during the pre-application process.
- 3.1.4 Therefore, a further review of how many car parking spaces will be required at the site has been undertaken and is presented in this note.
- 3.1.5 The guest car parking requirement has been derived from applying the anticipated guest car modal split to the relevant guest composition profiles, which could access the site via car (69%) to the total bedroom numbers (206).
- 3.1.6 The total staff (60) operational staff parking requirement has been derived from setting an ambitious 10% staff car driver modal split travel plan target.
- 3.1.7 The review has identified an operational requirement for 147 car parking spaces. However, it is clear from discussions with the local authority that there is a desire to further reduce reliance on travel by single occupancy private car to the site. Therefore the applicant is willingly to implement a further reduction in space to 130, which also has the added benefit in giving over more area to landscaping within the site.

3.2 **Conclusion**

- 3.2.1 The revised total parking provision proposed at the site is 130 car parking spaces. This is a reduction of 69 spaces from the existing provision on site and a further reduction of 22 spaces from that presented with the application and deemed acceptable during the pre-application process

APPENDIX A. LBH PRE-APP RESPONSE



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Case Officer: Haydon Richardson
Email: hrichardson@hillington.gov.uk
Date: 23rd September 2025
Our Ref: 36728/PRC/2025/89

Dear Giuseppe Cifaldi

RE: Change of use from office premises (Class E) to a hotel (Class C1), incorporating a rooftop extension, internal and external building alterations, parking reconfiguration and provision (2 options)

SITE: Capital Place 120 Bath Road Harlington

I refer to your request for pre-application planning advice dated 09.06.25 and our subsequent meeting on 06.08.2025 regarding the above development. The advice provided in this report is based on:

Location Plan
Toyoko Inn, Heathrow: Design & Access Statement
Marketing Letter - De Souza - SJM/PF/11569
Colliers Investment Overview
Sequential Test Draft
Toyoko Inn, Heathrow: Transport Note - ITL210199-001b

Plan Numbers:

Toyoko Inn, Heathrow: Design & Access Statement - received 11 Jun 2025

Marketing Letter - De Souza - SJM/PF/11569 - received 11 Jun 2025

Capital Place, 120 Bath Road, Heathrow, UB3 5AN - Colliers Investment Overview - received 11 Jun 2025

Sequential Test Draft - received 11 Jun 2025

Location Plan - received 11 Jun 2025

Toyoko Inn, Heathrow: Transport Note - ITL210199-001b - received 11 Jun 2025

Outlined below is a preliminary assessment of the proposal, including an indication of the main issues that should be addressed should you choose to submit a formal planning application. Please note that the views expressed in this letter represent officer opinion only and cannot be taken to prejudice the formal decision of the Council in respect of any subsequent planning application, on which consultation would be carried out which may raise additional issues. In addition, the depth of analysis provided corresponds with the scope of information made available to Council officers.

The Site and Surrounds

The site is located on the north side of the A4 Bath Road, west of its junction with High Street and approximately 200m north of Heathrow Airport. It is occupied by a part 4 storey, part 3 storey office building. The area is mixed use in character, with mainly commercial and employment uses on the sites fronting the A4 Bath Road and residential dwellings of varying types and designs immediately to the north and north-east of the site, including Heath Close which adjoins the site to the north-east.

The site lies within the area of Tree Preservation Order (TPO) no. 29, is potentially contaminated land and is within a landfill buffer. It is located within the Hillingdon Air Quality Management Area, the Harlington Corridor Air Quality Focus Area, the Heathrow Archaeological Priority Area, Flood Zone 1 and has a Public Transport Accessibility Level (PTAL) of 4.

The Proposal

The application seeks planning advice on the change of use from office premises (Class E) to a hotel (Class C1), incorporating a rooftop extension, internal and external building alterations, parking reconfiguration and provision.

2 options for the proposed development have been presented in the application.

Option 1 proposes a light touch retrofit of the existing building comprising internal alterations, glazing replacement with infill walls throughout and necessary restoration/improvements to meet current building regs standards. As mentioned above the works also include an infill extension at 3rd floor to the north west corner of the building. The proposed works would result in the creation of a 199 room hotel with GIA of approximately 6477sqm.

Option 2 proposes a comprehensive retrofit of the existing building comprising internal alterations, installation of external screening, glazing replacement with infill walls throughout and necessary restoration/improvements to meet current building regs standards. The works also include an infill extension at 3rd floor to the north west corner of the building and single storey extension to the south east corner. The proposed works would result in the creation of a 203 room hotel with GIA of approximately 6092sqm.

Planning Policy

The proposed development would be assessed against the following plans and all other relevant supplementary planning guidance and documents:

The National Planning Policy Framework (NPPF) (2024)

The London Plan (2021)

Local Plan: Part 1 - Strategic Policies (2012)

Local Plan: Part 2 - Development Management Policies (2020)

Local Plan: Part 2 - Site Allocations and Designations (2020)

Part 1 Policies:

PT1.BE1 (2012) Built Environment

PT1.E1	(2012) Managing the Supply of Employment Land
PT1.EM7	(2012) Biodiversity and Geological Conservation

Other Policies:

DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DME 4	Visitor Attractions
DME 5	Hotels and Visitor Accommodation
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
LPP E10	(2021) Visitor infrastructure
LPP E2	(2021) Providing suitable business space
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DME 2	Employment Uses Outside of Designated Sites
DMH 3	Office Conversions
LPP E1	(2021) Offices
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
LPP D1	(2021) London's form, character and capacity for growth
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D5	(2021) Inclusive design
LPP D8	(2021) Public realm
LPP G5	(2021) Urban greening
LPP GG2	(2021) Making the best use of land
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T7	(2021) Deliveries, servicing and construction

Main Planning Issues

1. Principle of development

LOSS OFFICES

Policy E1 of The London Plan (2021) states that existing viable office floorspace capacity in locations outside the areas identified in Part C should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal, and re-provision of office space where viable and releasing surplus office capacity to other uses.

Development proposals related to new or existing offices should consider the need for a range of suitable workspace including lower cost and affordable workspace. The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored. The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H. Surplus office space includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document). This evidence should be used to inform viability assessments.

Policy DME 2 of the Hillingdon Local Plan: Part 2 states that proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:

- i) the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii) the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or
- iv) The new use will not adversely affect the functioning of any adjoining employment land; or
- v) The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.

The Council's Planning Policy Officer was consulted on the proposed development and clarified that only one of the exceptions in DME 2 need be satisfied in order to justify the loss of the office. This information was shared with the applicant via email dated 14/08/25.

Within the covering letter the applicant has advised that the loss of the office is justified under exceptions ii, iii, iv noted above.

Holiday Inn Heathrow is located to the east of the site on the other side of High Street, Harlington. Sheraton Skyline Hotel adjoins the site to the west. Due to the nature of the proposed physical works (internal layout alterations, glazing replacement, material facade changes, infill roof extension, entrance extension, minor parking related landscape alterations), their separation distance from the neighbouring hotels and the fact that the proposed developments parking and operational requirements would all take place within the confines of the site (thus negating any adverse impact on neighbouring land), it is considered that the proposal would not adversely affect the functioning of any adjoining employment land. Hotels dominate the Bath Road, providing healthy competition for one another along this key transport link to Heathrow and It is considered that the provision of one additional hotel would therefore not undermine the functioning of the adjoining hotels. Furthermore the development site is not allocated for employment use and neither is neighbouring land, thus allowing for a degree of flexibility in its usage. The development is therefore considered to broadly meet the requirements of exception iv.

The applicant has also submitted marketing evidence and other details to satisfy exceptions ii and iii.

In summary, the covering letter advises that the proposal complies with Policy DME 2 because the site is no longer viable for employment use and is well-suited for a hotel. Located within the Heathrow Opportunity Area, the property is in a predominantly commercial and hotel-oriented zone. The existing office building has been vacant since 2018 and is in a state of disrepair, requiring substantial investment to be brought up to modern standards. Due to the significant and sustained decline in the local office market following the COVID-19 pandemic, there has been no realistic prospect of the site being reused for employment purposes, a claim supported by extensive marketing evidence that exceeds the 12-month requirement. As the proposed hotel use is compatible with the surrounding area's character and will not adversely affect any adjacent employment land, the change of use is considered a strategic and justified approach that aligns with the area's economic growth objectives.

While the submitted marketing evidence and information on site unsuitability are not considered robust, they collectively support the case that the building is no longer fit for its current purpose. More importantly, as the other policy exception has been satisfied, the loss of the office space is not objected to.

PROVISION OF HOTEL

Paragraph 91 of the NPPF (2024) states 'Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. 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. Paragraph 92 states 'When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored'.

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

Policy E10 of the London Plan (2021) states:

A London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

B The special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.

C A sufficient supply and range of serviced accommodation should be maintained.

D The provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.

E Camping and caravan sites should be supported in appropriate locations.

F Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.

G In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London.

H To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:

- 1) 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52121 incorporating either Figure 30122 or 33123 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; or
- 2) 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible

Policy DME 5 of the Local Plan Part 2 (2020) states:

The Council will support a range of visitor accommodation, conference and related uses in accessible sustainable locations, as defined in the Site Allocations and Designations document, subject to: i) A high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and the streetscape; ii) Provision of an accessible layout and rooms in accordance with Policy DME 6: Accessible Hotels and Visitor Accommodation; and iii) No adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.

Sequential Test Requirement

Hotels are considered to be a main town centre use. The proposed hotel would not be within a town centre, nor would it be within a site allocated for such uses within the Local Plan. It is noted that the development site would be broadly within the Heathrow Opportunity Area (which whilst not defined in terms of boundaries, does identify the areas around Heathrow Airport as capable of accommodating a significant level of commercial and residential growth). Despite the site's location within the HOA, Policy E10 of the London Plan (2021) is clear that such serviced accommodation needs to be brought forward in accordance with the sequential test (set out in policy SD7).

Taking into consideration the above, the applicant is required to demonstrate compliance with the sequential test.

Draft Sequential Test Review

A draft sequential test (DST) has been submitted in support of the application.

The applicant has stated that the parameters of the test have been determined by acceptable developments at 118 Bath Road (Ariel Hotel) and 242 Bath Road (Axis House).

At the time of writing this report the Ariel Hotel application (1126/APP/2023/3671) is yet to be determined as such the approach taken in compiling the sequential test cannot be confirmed as

acceptable. Furthermore the proposed development is fundamentally different as it involves the introduction of a new use on the site and the loss of an office building, whereas the Ariel Hotel scheme involves retaining, extending and intensifying the use of an existing Hotel site (which would be more supportable sequentially than the proposal).

The construction of a new hotel building at the car park adjacent to Axis House was approved at appeal on 15/05/24 (APP/R5510/W/23/3327482, Council Ref: 43794/APP/2021/3685). Despite the application being refused by the LPA the sequential test was deemed to be acceptable at the time for the following summarised reasons:

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

It should also be noted that Officers disagreed with some of the assumptions/parameters within the ST submitted for the Axis House application. As such it would not consider this to be a robust example if looking to assume the parameters which were involved in reaching the outcome.

There are no previous consents on this development site for Hotel use, so the proposal is not comparable in this respect. Despite this, the location of the developments are comparable and therefore the parameters used (set out in paragraph 2.15 of the DST) are generally considered to be acceptable for identifying potential sites. Notwithstanding the above, any future sequential test for the proposed development should take into consideration the following:

The methodology section states that the 20-minute public transport radius has been measured from Terminals 2 and 3. The terminals are large and therefore the exact origin point needs to be confirmed as results may vary depending on exactly where the measurements were taken from. A scaled location plan with a search radius/TIM Map would be helpful in assessing the acceptability of any future ST.

Within the DST the applicant states ' A rationale has been provided for the inclusion or exclusion of each site. Sites within the London Borough of Hounslow, Ealing and Hillingdon are considered. However towns outside of the 20-minute catchment area are excluded, as they are not reasonable suitable to serve Heathrow Airport.'

No explanation has been provided as to why such areas are not reasonable to serve Heathrow Airport and it is unclear whether or not they fall outside of the 20 minute public transport radius as the radius itself is unclear (as stated above). The search area therefore requires review, with a need to justify the exclusion of specific town centres such as Feltham, Staines and Slough, as well as Hounslow Central. When submitted, the future document should also state a minimum site threshold for the search, as the current draft only notes the proposed site's capacity of 203 beds; a minimum of threshold of 150 beds is suggested.

Additionally, any future sequential test must be supported by a thorough review of potential alternative sites from a variety of sources. This includes a robust search of sites currently available on the open market, citing specific sources like Rightmove; such sites have not been included within the DST.

The DST considers local plan and draft local plan site allocations (even those predominantly for residential use) this approach is acceptable and should be added to where possible. An up to date review of recent planning approvals for similar-scale brownfield developments should also be conducted and all findings should be presented in a clear, structured table format with specific headings, including site name, boundary, borough, town centre, postcode, size, source, description,

planning history, and the rationale for discounting each site.

Whilst the provision of a hotel is not wholly objected to in this sustainable location (next to other hotels). It is considered that in order for the Council to support a future application a more robust sequential test should be submitted which addresses the issues raised above.

Concerns regarding hotel design and accessibility are set out later in the report.

2. Design

Paragraphs 131 and 135 of the NPPF advise that the creation of high quality, beautiful, and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process

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

Policy BE1 of Hillingdon Council's Local Plan Part 1 state that the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents, and be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes, and views.

Policy DMHB 11 of Hillingdon Council's Local Plan Part 2 states that:

A) All development will be required to be designed to the highest standards and incorporate principles of good design, including:

- i) harmonising with the local context by taking into account the surroundings:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high-quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact the amenity and daylight/sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory redevelopment of any adjoining sites which have development potential. Regarding proposals for major development sites, the Council expects developers to prepare master plans and design codes and agree on these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling, and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts on occupiers and neighbours.

Policy DMHB 12 of Hillingdon Council's Local Plan Part 2 states that development should be well integrated with the surrounding area and accessible.

With regard to the visual impacts of the proposed development on the surrounding area, there are no in principle objections to Options 1 or 2. Notwithstanding this point, the design of the resulting building and site are key elements of the scheme which impact on functionality, longevity and attractiveness and therefore the following should be considered and addressed in any future proposal.

The existing building does not feature a strong architectural detail of any merit, it has a functional appearance which may have contributed to the lack of interest in the floorspace. The existing building will require significant improvements if a hotel is to prove to be a viable long term and optimal use for the site. More detailed comments are set out below however given the lack of design detail in the submission Officers are concerned with the proposed indicative design and will be expecting significant improvements should the applicant be minded to submit a formal application.

Option 1 - Light touch retrofit

The proposed light touch retrofit is predominantly made up of internal works and would result in a building which is of similar appearance to the existing building.

The existing building is aged and lacks distinctiveness. No evidence has been submitted to suggest that its failure as an office was not partly down to its somewhat underwhelming design. Taking into consideration that the design of the building (alongside Covid and other matters) could have contributed to its current vacancy, a light touch retrofit is unlikely to result in a building which would be attractive as a hotel. Furthermore, planning guidance advises that all development should be of high quality design and therefore the proposed hotel should make effort to adhere to these requirements, especially as hotels are serviced accommodation which should be both functional and visually appealing to their many visitors. Option 1 is therefore advised against on design grounds.

Option 2 - Entrance design

We are not currently convinced by the proposed changes to the main entrance in Option 2. The cut-out void with a reduction towards a single-storey entrance appears underwhelming and somewhat counter-intuitive given the scale, bulk, and massing of the existing building. The entrance itself also appears minimal and lacks a sense of generosity or visual presence.

While we do not fully discount this option, it requires further design development to ensure that the entrance feels more in keeping with the scale and character of the existing building. This could likely be achieved through some increase in height and volume of the entrance element compared to what is currently proposed in Option 2. Additionally, greater legibility and a more celebrated sense of arrival could be achieved through architectural expression - form, appearance, materials, colour palette, and other visual elements.

We would also welcome it if the applicant explored a broader range of alternative design approaches for this element, should they decide to take Option 2 forward. Any proposed main entrance should be clearly legible, easy to locate and navigate to, and should sit comfortably within the overall composition of the building - both in terms of scale and architectural appearance. Details of likely signage could also be helpful in assessing the overall legibility of the entrance and should therefore be submitted. Effort should also be made to visually integrate any new entrance with the facades of the building.

Feasibility & Impact on Design

Given that the existing site has remained unused since the Covid pandemic, we would like to understand whether the proposed renovation scheme is likely to address the issues that contributed to the original building's closure and if so, how these issues have been resolved through the new design approach. Such information should be provided within any future design and access statement.

Alternative GF Uses

Residential development is becoming increasingly common along the Bath Road. As part of the redevelopment of this site there may be potential to consider a more mixed-use ground floor that caters not only to prospective hotel guests, but also to nearby residents - many of whom currently lack access to local amenities within walking distance. The inclusion of such facilities is not a determining factor, however if a mixed use ground floor is not to be included, details of why should be provided within any future design and access statement.

Materials, Car-parking & Landscaping Strategy

Any future application should include a comprehensive materials schedule detailing the materials to be used for the proposed infill extensions, entrances, glazing, infill walls, and all other external finishes. The details will enable the council to make a thorough assessment as to the visual impacts of the proposed works on the existing building and visual amenities of the wider area.

The site currently includes a very large legacy car park, the scale of which appears to reflect outdated parking standards and travel patterns from several decades ago - prior to the improvement of the local public transport network in the area and the broader cultural shift away from prioritising the private car. If parking spaces are to be removed or reconfigured, we would welcome the opportunity to introduce more meaningful greening across the site - particularly through new tree planting and low-level landscaping, such as hedges, ornamental grasses, and other visually attractive species suited to the location. However, it should be noted that we would not support continuous hedge lines that obstruct views between Bath Road and the building. In addition to details regarding materials, any future application should be accompanied by a clearly articulated landscaping strategy, which includes details of how the development would contribute to an improved public realm, enhanced biodiversity, and a greener, more attractive setting for the building.

VUCity & Verified Views

The council has access to VUCity, which is used to inform a more comprehensive understanding of the proposal and its impact on the surrounding context - particularly with regard to the visual appearance of the building and additional massing at rear. We would like a VUCity model to be provided as part of the pre-application process. Following a VUCity model review, verified views (locations and types) are to be reviewed and agreed with the applicant in advance of a formal submission to ensure they adequately demonstrate the scheme and its visual impacts (short, medium and long distance).

Conclusion

Given the existing buildings set back from the main road, visual screening caused by its boundary treatments, and the fact that buildings of numerous design, height and use exist along the Bath Road, it is unlikely that the implementation of Options 1 or 2 would have any significant adverse impact on the character and appearance of the area.

Notwithstanding the above, the proposed hotel is sited within a competitive area for hotels, as such

any new hotel should be designed to compete as this would ensure its longevity. The existing building is aged and lacks distinctiveness, as such a light touch retrofit is unlikely to result in a building which would be attractive as a hotel. To ensure the best design and long term use of the site, a comprehensive retrofit should be pursued and different design options should be explored (working from Option 2), which take into consideration the advice set out within this report.

Follow up pre application advice could assist in finalising a supportable design.

3. Amenity

Neighbouring Amenity:

Policy DMHB 11 of Hillingdon Council's Local Plan Part 2 seeks to ensure that development proposals do not adversely impact residential amenities, daylight, and sunlight of adjacent properties, and open space. The supporting text for this policy states that the Council will expect new development proposals to carefully consider layout and massing to ensure development does not result in an increased sense of enclosure and loss of outlook.

The nearest neighbouring properties to the development site are on Heath Close, approximately 50m north. Due to the nature of the proposed physical works (internal layout alterations, glazing replacement, material facade changes, infill roof extension, entrance extension, landscape alterations) and their significant separation distance from the mentioned properties, the proposed works are considered to cause no harmful loss of outlook, light or privacy to the occupiers of neighbouring dwellings. Landscaping around the site would be retained to help with noise buffering. Furthermore, the submitted information suggests that parking is likely to be reduced at the site, which could in turn lead to less vehicle related noise outside of the building. Notwithstanding these points, it is recommended that a noise impact assessment be submitted to ensure that any increased activity caused by the change of use causes no disturbance to nearby residents.

Activity levels are likely to be increased during the evenings when compared with the existing office use, however the development is within a busy mixed use area, where activity in the evenings is not uncommon and therefore any increases associated with the change of use are unlikely to be harmful, especially given the mentioned separation distance.

Subject to acceptable levels of noise generation, it is likely that the proposed developments would cause no harm to neighbouring amenities.

4. Highways

Paragraph 116 of the NPPF states 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, following mitigation, would be severe, taking into account all reasonable future scenarios.

Policy T2 of The London Plan states that development proposals must demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, reduce the dominance of vehicles on London's streets, whether stationary or moving, and be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. Policy T4 states that development proposals should not increase road danger. Policy T5 states that development proposals should help remove barriers to cycling and create a healthy environment where people choose to cycle. Policy T6 states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Appropriate disabled persons parking for Blue Badge holders should be provided, and where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles. Policy T7 states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage, and deliveries should be made off-street, with on-street loading bays only used where this is not possible.

Policies DMT 1 and DMT 2 of Hillingdon Council's Local Plan Part 2 require the Council to consider whether the traffic generated by proposed developments is acceptable in terms of the local highway and junction capacity, traffic flows, and conditions of general highway or pedestrian safety. Policy DMT 5 states that development proposals will be required to meet the Council's cycle parking standards as set out in Appendix C Table 1.

Policy DMT 6 requires that proposals comply with the Council's parking standards to facilitate sustainable development and address issues relating to congestion and amenity. With regards to the provision of new hotels the policy specifically states that parking requirements should be determined 'On an individual basis and in addition to car parking requirements: (a) Provision for taxi pick up and set down to be provided. (b) One coach parking space is required per 50 rooms. (c) Within existing and proposed hotel developments, the use any of the hotel car parking for car rental operations or short/long stay airport or other public car parking will require planning permission. (d) Hotels which include function/banquet and dining rooms (which may include: ballrooms, conference and meeting rooms, exhibition space, restaurants, cafes, bar areas, nightclubs and any other rooms capable of use for hosting functions, business meetings or for eating/drinking) will require a transport appraisal to assess the level of car parking.' Furthermore 1 cycle parking space should be provided per 10 members of staff.

The Site has a Public Transport Accessibility Level (PTAL) Rating of 4 based on a scale from 0 to 6b, where 6b is the highest.

A Transport Note has been submitted in support of the application. The note advises that 203 parking spaces currently exist at the site. Post development 174 spaces would remain (162 standards spaces). 9 existing car parking spaces will be enlarged to create accessible parking spaces and 9 spaces would have EV charging capacity. Furthermore, a covered and secure cycle store for 6 cycles will be provided, alongside 1 appropriately sized mini bus space and 1 coach space. The transport note also advises that 'the overall trip attraction of the site is significantly lower as a hotel than as an office, with c. 440 arrivals and 440 departures per day as a hotel, compared to c. 760 arrivals and 760 departures pre day as an office. Similarly the overall vehicles movements at the site will be lower when occupied as a hotel, with circa 65 vehicles per day arriving departing as a hotel, and 300 vehicles arriving and departing per day as an office.'

After reviewing the assessment it is concluded that the proposed car parking reduction and resulting provision is acceptable, however the spaces must be exclusively for hotel guests and staff.

Furthermore, to ensure the development functions effectively, dedicated and appropriate drop-off facilities for taxis and coaches are required and should be clearly shown on any future application once a design option has been chosen.

Cycle parking provisions appear to be acceptable but must comply with the London Cycle Design Standards.

In terms of trip generation, the submitted information shows a reduction which is welcomed. However to fully assess the potential transport impacts of the proposal, a detailed Transport Statement is required at formal application stage. This should include a trip generation analysis comparing the former use with the chosen final design option, as well as an Active Travel Zone assessment, including during night-time hours. The applicant must also provide a Service and Delivery Plan, complete with swept path drawings, a Parking Design and Management Plan, and a Travel Plan. Clarity should also be provided on which parking spaces will be removed and or altered.

Any future application should also clarify whether the meeting rooms are for public hire or solely for the use of Hotel staff and its users as this could significantly increase the number of trips and parking

demand.

Overall it is considered that the proposal could have an acceptable highways impact, however further information is needed.

5. Other

Quality of Hotel Accommodation:

It should be noted that there are no adopted planning standards in respect of providing privacy/overlooking or light for hotel guest bedrooms. Nevertheless, paragraph 135 (f) of the NPPF (2024) advises that new development should provide a high standard of amenity for all.

At present, we are concerned that both options include a number of rooms without access to natural light, outlook, or passive ventilation. While a limited number of such rooms may be considered acceptable due to their intended short-term occupancy, we would welcome clarification on the following points:

- How many rooms fall into this substandard category, as a number of rooms and as a percentage of the total rooms to be provided?
- What contingency plan is in place should the mechanical ventilation systems fail (including overheating / purge ventilation)?

The overall standard of accommodation provided is likely to be acceptable given the proposed use and lack of policy conflict, however clarity on the above is necessary in order for the council to support the scheme.

Accessibility:

This pre application to convert the existing office building into a hotel, has been reviewed with reference to London Plan Policy E10 and D5, which may be applicable if there is scope to provide a good standard of accessibility as part of any future works. The LPA and developer are required to secure improved accessibility as part of The Equality Act 2010. The Act mandates that service providers proactively identify and eliminate barriers hindering disabled people. Any requirements to improve accessibility should be relative and proportionate to the proposed physical alterations to the existing building. No accessibility concerns are raised at this stage, however the developer should consider where accessibility can be improved, alongside if accessible hotel rooms can be provided.

Biodiversity:

In England, Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Developers must deliver a BNG of ten per cent. This means a development will result in more or better-quality natural habitats than there were before development.

Chapter 15 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Paragraph 8.6.6 of The London Plan states that biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost due to development, the compensation provided should be of an overall greater biodiversity value than that which is lost. This approach does not change the fact that losses should be avoided, and biodiversity

offsetting is the option of last resort.

Paragraph 6.28 of Hillingdon Council's Local Plan Part 2 states that it is important that planning decisions are appropriately informed by the right level of survey and information on ecology features. Where appropriate, the Council will require the use of the approved DEFRA biodiversity impact calculator to inform decisions on no net loss and net gain.

The applicant must submit a BNG Assessment with a full application and annotated BNG drawing demonstrating a ten per cent onsite BNG or demonstrate to the Council why the proposed development is exempt from complying with BNG policy.

Landscape and Urban Greening Factor:

A large portion of the site is covered by a Tree Protection Order.

Policy G5 of The London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. Policy G5 recommends a target Urban Greening Factor (UGF) score of 0.3 for predominately commercial development. Policy G6 states that Sites of Importance for Nature Conservation (SINCs) should be protected. Policy G7 of The London Plan states development proposals should ensure that, wherever possible, existing trees of value be retained.

Policy DMHB 14 of Hillingdon Council's Local Plan Part 2 states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity, or other natural features of merit. Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread, and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

For a major application, the Applicant must submit an Urban Greening Factor Statement and annotation UGF drawing detailing how the proposal would meet the requirements of The London Plan.

Hillingdon Council's validation checklist requires the submission of a Landscape Strategy for all major and minor development proposals that include external space. The Council will require details of existing and proposed planting to be submitted with the application. Particular consideration should be given to the following:

- (a) proposed finished ground levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas, structures and ancillary objects (refuse bins, lighting columns, etc.);
- (b) proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines etc., indicating lines, manholes, etc.);
- (c) native and or wildlife-friendly species, including large canopy trees and species likely to be resilient to the effects of climate change;
- (d) the use of sustainable drainage systems and surface water to irrigate new landscaping;
- (e) boundary treatments to ensure that hedgehogs and other wildlife could traverse the site.

Landscape principles should seek to retain existing trees and other vegetation, where practicable, and provide details of how they can be protected during the construction of the development. Plans should clearly show which trees or landscape features are to be retained and which are proposed for removal.

It is unlikely that the proposed works to the building would impact adversely on trees at the site given

their nature. However landscaping changes, construction and the replacement/removal and alteration of parking spaces could. If trees are to be pruned, felled or adversely impacted, an arboricultural impact assessment should be submitted with any future application, alongside an appropriate tree survey. Tree protection details could also be submitted upfront to avoid conditions. Landscaping around the boundary of the site should be protected and retained and if there is opportunity to add additional soft landscaping in appropriate areas, the provisions are welcomed.

Air Quality:

Policy SI1 of The London Plan states to tackle poor air quality, protect health and meet legal obligations, the following criteria should be addressed:

- 1) Development proposals should not: a) lead to further deterioration of existing poor air quality
- 2) In order to meet the requirements in Part 1, as a minimum:
 - a) development proposals must be at least Air Quality Neutral.
 - c) major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1.

Paragraph 9.1.5 of The London Plan states for major developments, a preliminary Air Quality Assessment should be carried out before designing the development to inform the design process. The aim of a preliminary assessment is to assess the most significant sources of pollution in the area, constraints imposed on the site by poor air quality, appropriate land uses for the site, and appropriate design measures that could be implemented to ensure that development reduces exposure and improves air quality.

Paragraph 9.1.6 of The London Plan states that further assessments should then be carried out as the design evolves to ensure that impacts from emissions are prevented or minimised as far as possible and to fully quantify the expected effect of any proposed mitigation measures, including the cumulative effect where other nearby developments are also underway or likely to come forward.

Policy EM8 of Hillingdon Council's Local Plan Part 1 states that the Council will seek to safeguard and improve all land, water, air, and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors.

Policy DME1 14 of Hillingdon Council's Local Plan Part 2 states:

- A) Development proposals should demonstrate appropriate emissions reductions to sustain compliance with and contribute to meeting EU limit values and national air quality objectives for pollutants.
- B) Development proposals should, as a minimum:
 - i) be at least "air quality neutral";
 - ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
 - iii) actively contribute towards improving air quality, especially within the Air Quality Management Area.

Please also refer the London Borough of Hillingdon's Air Quality Local Action Plan which will inform the Council's decision making.

The Site is in the Hillingdon Air Quality Management Area and Air Quality Focus Area.

An Air Quality Assessment with appropriate mitigation must be provided with any future planning application. The reduction of emissions to be achieved by each measure to be proposed needs to be quantified, or a flat rate discount agreed with the Local Planning Authority. Any remaining S106 contribution would be calculated based on total emissions.

The Transport Assessment must present the total daily trip generation (not net) to support the air quality calculations. The Applicant must tabulate daily trip generation associated with the proposed development per land use class as these would have different trip generations per sq. m.

Given the size of the proposed development and its sensitive location with regards air quality, the LBH requires the Applicant to follow an air quality positive approach to reduce, to the maximum possible extent, emissions into the atmosphere of NOx and PM10/2.5.

Contaminated Land:

Policy DMEI 11 of Hillingdon Council's Local Plan Part 2 states that all development proposals within a Source Protection Zone, Safeguard Zone, or Water Protection Zone must assess any risk to groundwater resources and demonstrate that these would be protected throughout the construction and operational phases of development.

Policy DMEI 12 of Hillingdon Council's Local Plan Part 2 requires proposals for development on potentially contaminated sites to be accompanied by at least an initial study of the likely contaminants. Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented prior to the commencement of development.

The site is located upon potentially contaminated land. Due to the nature of the proposed physical works (internal layout alterations, glazing replacement, material facade changes, infill roof extension, single storey entrance extension). The proposed development is unlikely to unearth contaminants. Nevertheless, if a formal application were submitted, the Council's Land Contamination Officer would be consulted and conditions could be imposed requiring ground investigation surveys and other appropriate actions to ensure that contamination is dealt with properly, if found.

Crime Prevention:

Policy D11 of The London Plan states that development proposals should maximise building resilience and minimise potential physical risks, including those arising because of extreme weather, fire, flood, and related hazards. Development should include measures to design out crime. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area. Measures to design out crime should be integral to development proposals and considered early in the design process, considering the principles contained in guidance such as the Secured by Design Scheme.

Policy DMHB 15 of Hillingdon Council's Local Plan Part 2 states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. These should be included in the Design and Access Statement. Developments will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:

- i) providing entrances in visible, safe and accessible locations;
- ii) maximising natural surveillance;
- iii) ensuring adequate defensible space is provided;
- iv) providing clear delineations between public and private spaces; and
- v) providing appropriate lighting and CCTV.

To obtain further advice, the Council advise you to contact the Metropolitan Police's Secure by Design Officer, PC Robert Palin, who you can contact at 020 8733 5245 or by e-mail at Robert.Palin@met.pnn.police.uk. Any grant of planning permission would be subject to a secure by

design condition to achieve appropriate accreditation.

Fire Safety:

Policy D12 of The London Plan states the following:

A) In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:

- 1) identify suitably positioned unobstructed outside space:
 - a) for fire appliances to be positioned on
 - b) appropriate for use as an evacuation assembly point
- 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; appropriate fire alarm systems and passive and active fire safety measures
- 3) are constructed in an appropriate way to minimise the risk of fire spread
- 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
- 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in
- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

Applicants must consider fire safety early in the development process and major applications must be accompanied by a Fire Statement prepared by a suitably qualified assessor.

Flood Risk:

Policy SI12 of The London Plan states that proposals should ensure that flood risk is minimised and mitigated and that residual risk is addressed.

Policy EM6 of Hillingdon Council's Local Plan Part 1 states that Applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 9 of Hillingdon Council's Local Plan Part 2 states the Council will refuse proposals that fail to make appropriate provision for flood risk mitigation or which would increase the risk or consequences of flooding.

The building is located within Flood Zone 1 as defined by the Environment Agency and is therefore recognised to have a low probability of flooding and is not within a Critical Drainage Area to small sections of the Site are susceptible to surface water flooding. Due to the scale of the development (Major), a Flood Risk Assessment (FRA) must be submitted in support of any future application.

Drainage:

Policy SI13 of The London Plan states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- 1) rainwater use as a resource (for example, rainwater harvesting, blue roofs for irrigation)
- 2) rainwater infiltration to ground at or close to source
- 3) rainwater attenuation in green infrastructure features for gradual release (for example, green roofs and rain gardens)

Policy DMEI 10 of Hillingdon Council's Local Plan Part 2 states that developments should be drained

by a Sustainable Urban Drainage Systems (SUDS) and must include appropriate methods to avoid pollution of the water environment. Preference should be given to utilising the drainage options in the SUDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon. Major development should adopt a 'treatment train' approach where water flows through different SUDS to ensure resilience in the system.

Any future application should be supported by a Drainage Assessment and plans, including details of SUDS, run off rates, discharge locations, and the water cycle strategy, i.e. reduce, reuse, recycle.

Noise:

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. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

Policy D14 of The London Plan states that to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:

- 1) avoiding significant adverse noise impacts on health and quality of life
- 2) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
- 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
- 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials - in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated by applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

As mentioned in the neighbouring amenity section of this report, a Noise Impact Assessment would be required at the submission stage to demonstrate that the noise levels would be within an acceptable range, considering noise generated by the development and any associated plant, ventilation, cooling units, etc.

Agent of Change and Design Mitigation:

Policy D13 of The London Plan requires adherence to Agent of Change principles and places responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new sensitive development.

Policy E7 of The London Plan also requires appropriate design mitigation regarding safety and security, minimising conflict between site uses, design quality, and amenity agent of change, vibration and noise and air quality and potential contamination.

The development involves the provision of a Hotel, near to A road, in a busy mixed use area. The applicant must demonstrate that appropriate mitigation measures are incorporated into the design to ensure that suitable internal and external environments are provided.

Carbon Reduction, Energy, and Sustainability:

Policy SI2 of The London Plan states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the energy hierarchy. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations¹⁵² is required for major development. Non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:

- 1) through a cash in lieu contribution to the borough's carbon offset fund, or
- 2) off-site

This policy further states that major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment not covered by Building Regulations, i.e., unregulated emissions.

Policy DMEI 2 of Hillingdon Council's Local Plan Part 2 states that all major development proposals must be accompanied, at submission stage, by an Energy Strategy showing how reductions will be achieved in accordance with Policy SI of The London Plan. Applicants should follow the GLA Energy Assessment Guidance 2022, which details the information that should be provided within the assessment.

Overheating Assessment:

Policy SI4 of The London Plan states:

A) Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.

B) Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

An Overheating Assessment must be undertaken in line with the cooling hierarchy. This must be included at the planning submission stage. The assessment should consider natural and mechanical ventilation measures to address the potential for unacceptable levels of overheating. If mechanical ventilation is proposed, it should be minimal, clearly illustrated on proposed drawings and have a sympathetic location, design, and screening. Technical details (including a brochure) of the proposed plant or ventilation equipment must be provided at the submission stage.

Refuse and Recycling:

Policy DMHB 11 states 'Development proposals should make sufficient provision for well designed

internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours'.

The applicant must submit a Refuse Management Plan and Servicing Plan with any future formal planning application, including a swept path analysis of how waste will be collected. Detailed waste and recycling storage design should be submitted at the submission stage. Details should be provided on size and quantity of containers, as well as waste type. If enclosures are proposed, the Application must include annotated scaled drawings detailing their material, dimensions, and location.

Airport Safeguarding:

Paragraph 101 of the NPPF requires that planning decisions promote public safety and consider wider security and defence requirements by:

- a) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Policies for relevant areas (such as town centre and regeneration frameworks) and the layout and design of developments should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and
- b) recognising and supporting development required for operational defence and security purposes and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.

Policy DMAV 1 of the Local Plan Part 2 states that:

A) The Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.

B) In consultation with the Airport Operator, the Council will ensure that:

- i) areas included in Airport Public Safety zones are protected from development, which may lead to an increase in people residing, working or congregating in these zones; and
- ii) sensitive uses such as housing, education and hospitals are not located in areas significantly affected by aircraft noise without acceptable mitigation measures.

Developments exceeding 15 metres in height in this location will be referred to the National Air Traffic Service (NATS) and Heathrow Airport. As such, an Airport Safeguarding Report is a validation requirement. Any development likely to attract birds will also be referred to Denham Airport and Ministry of Defence. Taking into consideration the nature of the proposed developments, it is not anticipated that there would be any aviation related concerns.

6. Planning Obligation and CIL (Mayor and LBH)

Policy DMCI 7 of Hillingdon Council's Local Plan Part 2 states:

A) To ensure development is sustainable, planning permission will only be granted for development that clearly demonstrates there will be sufficient infrastructure of all types to support it. Infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL).

B) Planning obligations will be sought on a scheme-by-scheme basis:

- i) to secure the provision of affordable housing in relation to residential development schemes;
- ii) where a development has infrastructure needs that are not addressed through CIL; and
- iii) to ensure that development proposals provide or fund improvements to mitigate site specific impacts made necessary by the proposal.

C) Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.

The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6 April 2010) to request planning obligations that do not meet the following tests:

- i. necessary to make the development acceptable in planning terms
- ii. directly related to the development, and
- iii. fairly and reasonable related in scale and kind to the development

The effect of the Regulations is that the Council must apply the tests much more strictly and can only request planning obligations that are genuinely necessary and directly related to the development. Should the Council request planning obligations that do not meet the policy tests, the Council would have acted unlawfully and could be subject to a High Court challenge.

Community Infrastructure Levy (CIL):

Please be advised that as of 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100 sq. m. or more will be liable for the Mayoral CIL, as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will equal £60 per sq. m. (from April 2019). The London Borough of Hillingdon Council is a collecting authority for the Mayor of London, and this liability shall be paid to the London Borough of Hillingdon Council in the first instance.

In addition, the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1 August 2014. The liability payable is as follows:

- Large-format retail development (A1) greater than 1,000 sq. m., outside of designated town centres - £215 per sq. m.
- Offices (B1) - £35 per sq. m.
- Hotels (C1) - £40 per sq. m.
- Residential Dwelling Houses (C3) - £95 per sq. m.
- Industrial (B8) - £5 per sq. m.

Should you require further information, please refer to the Council's Website www.hillingdon.gov.uk/index.jsp?articleid=24738

It is important to note that this CIL liability will be in addition to the Section 106 planning obligations that the Council may seek from your proposed development.

7. Application Submission

The Council's adopted Local Planning Validation Checklist (February 2024) is available on the Council website. This is a comprehensive list of the information that will be required at the submission stage to validate a full planning application. The specialist reports requested within this report should also be submitted.

Please ensure your full application is accompanied by site photographs covering the site, the site's relationship with neighbouring buildings, and the site within the context of the canal and street. The location and direction of site photos must be annotated on a map.

8. Conclusion

As submitted, concerns exist regarding the robustness of the sequential test and therefore the principle of the proposed development. Concerns are also raised regarding the design of the scheme

and the quality of accommodation it would provide for its future users. Numerous specialist reports are missing from the submission which restrict the LPA from making a full assessment into the developments highways and other related impacts.

Whilst the provision of a hotel in this location could be acceptable. The applicant is encouraged to review and amend the proposal in light of the report findings before submitting any future application. Seeking follow up pre application advice could assist in reaching a supportable scheme.

Please be advised that the Council require confirmation that you wish to enter into a PPA as soon as possible, in order to ensure the necessary resource are in place to meet the terms of the PPA.

Thank you for entering into the Councils pre-application advice service and I trust you have found this service of assistance.

**Haydon Richardson
Principal Planning Officer
London Borough of Hillingdon**

Planning Guarantee

For complex applications which are likely to exceed the statutory timeframes, the applicant is encouraged to enter into a Planning Performance Agreement (PPA) to allow for the negotiation of complex cases. Central Government encourages the use of PPAs for larger and more complex planning proposals to bring together the developer, the Local Planning Authority and key stakeholders to work in partnership throughout the planning process.

Providing a PPA helps ensure that major proposals progress through the application process in a timely fashion and result in high quality development but the service is both time consuming and costly. The charge for all Planning Performance Agreements will ensure that adequate resources and expertise can be provided to advise on major development proposals, the charges are determined on a site by site basis.

Hillingdon are committed to ensure the best possible service provision to all of our applicants. In order to ensure this, we will not be able to facilitate negotiation which would result in an application being determined outside of statutory timeframes, unless the applicant has entered into a Planning Performance Agreement.

APPENDIX B. GUEST ORIGIN-DESTINATION ANALYSIS

% of Total Trips	26.2%				21.0%			
O/D Trips (m)	15.0				11.9			
O/D Region	London				The South			
	O/D	Pop	Drivetime	PT Time	O/D	Pop	Drivetime	PT Time
	Croydon	409,342	1h 15min	1h	Medway	292,655	1h 25min	1h 53min
	Barnet	405,050	45min	1h 36min	Southampton	269,781	1h 25min	2h 13min
	Ealing	385,985	28min	34min	Crawley	124,008	1h 5min	1h 34min
	Newham	374,523	1h 20min	1h 9min	Portsmouth	208,100	1h 25min	2h 19min
	Brent	352,976	45min	1h 45min	Brighton and Hove	283,870	1h 25min	1h 58min
	Total	1,927,876	1144011	783,865	Total	1178414	1178414	0
	% of Population		59%	41%	% of Population		100.00%	0.00%
	O/D Trips (m)		8.87	6.08	O/D Trips (m)		11.95	0.00
	% of Total Trips		15.6%	10.7%	% of Total Trips		21.0%	0.0%
% of Total Trips	22.6%				17.1%			
O/D Trips (m)	12.9				9.8			
O/D Region	The West				The East			
	O/D	Pop	Drivetime	PT Time	O/D	Pop	Drivetime	PT Time
	Swindon	224942	1h 20min	1h 35min	Cambridge	149,352	1h 58min	2h 24min
	Bristol	494399	1h 50min	2h 17min	Luton	239,090	55min	1h 42min
	BCP	196455	1h 50min	2h 44min	Milton Keynes	264,349	1h 10min	1h 47min
	Plymouth	277695	3h 50min	4h 28min	Norwich	147,182	2h 50min	2h 51min
	Reading	182907	45min	56min	Peterborough	219,510	2h	2h 14min
	Total	1376398	1376398	0	Total	1,019,483	1019483	0
	% of Population		100.00%	0.00%	% of Population		100.00%	0.00%
	O/D Trips (m)		12.88	0.00	O/D Trips (m)		9.78	0.00
	% of Total Trips		22.6%	0.0%	% of Total Trips		17.1%	0.0%
% of Total Trips	3.0%				9.5%			
O/D Trips (m)	1.7				5.4			
O/D Region	Wales				North & Midlands			
	O/D	Pop	Drivetime	PT Time	O/D	Pop	Drivetime	PT Time
	Cardiff	348,535	2h 40min	2h 38min	Birmingham	1,183,618	2h 10min	2h 40min
	Swansea	170,085	3h 10min	3h 33min	Manchester	589,670	3h 30min	3h 17min
	Newport	130,890	2h 10min	2h 20min	Liverpool	508,961	3h 50min	3h 49min
	Barry	56,605	2h 50min	3h 12min	Sheffield	556,500	3h	3h 16min
	Bridgend	51,760	2h 40min	2h 59min	Leeds	536,280	3h 30min	3h 32min
	Total	757,875	409,340	348,535	Total	3,375,029	2,276,398	1,098,631
	% of Population		54%	46%	% of Population		67%	33%
	O/D Trips (m)		0.92	0.78	O/D Trips (m)		3.66	1.77
	% of Total Trips		1.6%	1.4%	% of Total Trips		6.4%	3.1%
% of Total Trips	0.5%				100%			
O/D Trips (m)	0.3				57.0			
O/D Region	Scotland				Total			
	O/D	Pop	Drivetime	PT Time				
	Glasgow	632,350	6h 40min	5h 39min				
	Edinburgh	506,520	7h 10min	5h 36min				
	Aberdeen	198,590	9h	8h 34min				
	Dundee	148,210	7h 50min	7h 21min				
	Paisley	77,270	7h	5h 58min				
	Total	1,562,940	0	1,562,940				
	% of Population		0%	100%				
	O/D Trips (m)		0.00	0.31				
	% of Total Trips		0.0%	0.5%				

All		
Pop	Drive	PT
11,198,015	7,404,044	3,793,971
% of Population	66%	34%
O/D Trips (m)	48.06	8.94
% of Total Trips	84%	16%

APPENDIX C. GUEST COMPOSITION AND PARKING REQUIREMENT

Bedrooms	206		Origin-Destination = 84% Potential Guest Travel via Car		
		% of Rooms	Rooms	Potential Guest Travel via Car	Cars / Parking Requiriement
Business travellers	60%	123.6			
		35%	72	84%	61
		15%	31	84%	26
		10%	21	84%	17
Tourists	25%	51.5			
		18%	36	84%	30
		8%	15	0%	0
Transit	15%	30.9			
		8%	16	0%	0
		2%	4	84%	3
		2%	4	84%	3
		3%	6	0%	0
				Total/day	141

