



PLANNING, DESIGN AND ACCESS STATEMENT

SITE ADDRESS: Heathrow Point West, 234 Bath Road, Heathrow, UB3 5AP
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Executive Summary

This statement has been prepared by Total Planning on behalf of Nine Group to support a planning application for *'erection of a new 4 storey hotel extension building with accommodation at roof and basement levels to provide 128 room with covered link bridge to existing hotel building associated with ancillary works.'*

The proposal to regularise a large extension to the Novotel which is under construction. This application follows significant formal pre-application engagement with Hillingdon Council. It also follows commencement of planning permission ref: 41331/APP/2016/1035 for *'Erection of a 4 storey hotel existing building to accommodate 108 rooms with a covered link bridge to existing hotel building associated with ancillary works.'*

This development was commenced lawfully and a legal opinion from Conor Fegan FTB accompanies this statement (Appendix A) supports this position.

However, the client wishes to change a number of aspects of the scheme and discussions have occurred between them and the Council on how best to resolve and regularise the changes. The main changes sought are:

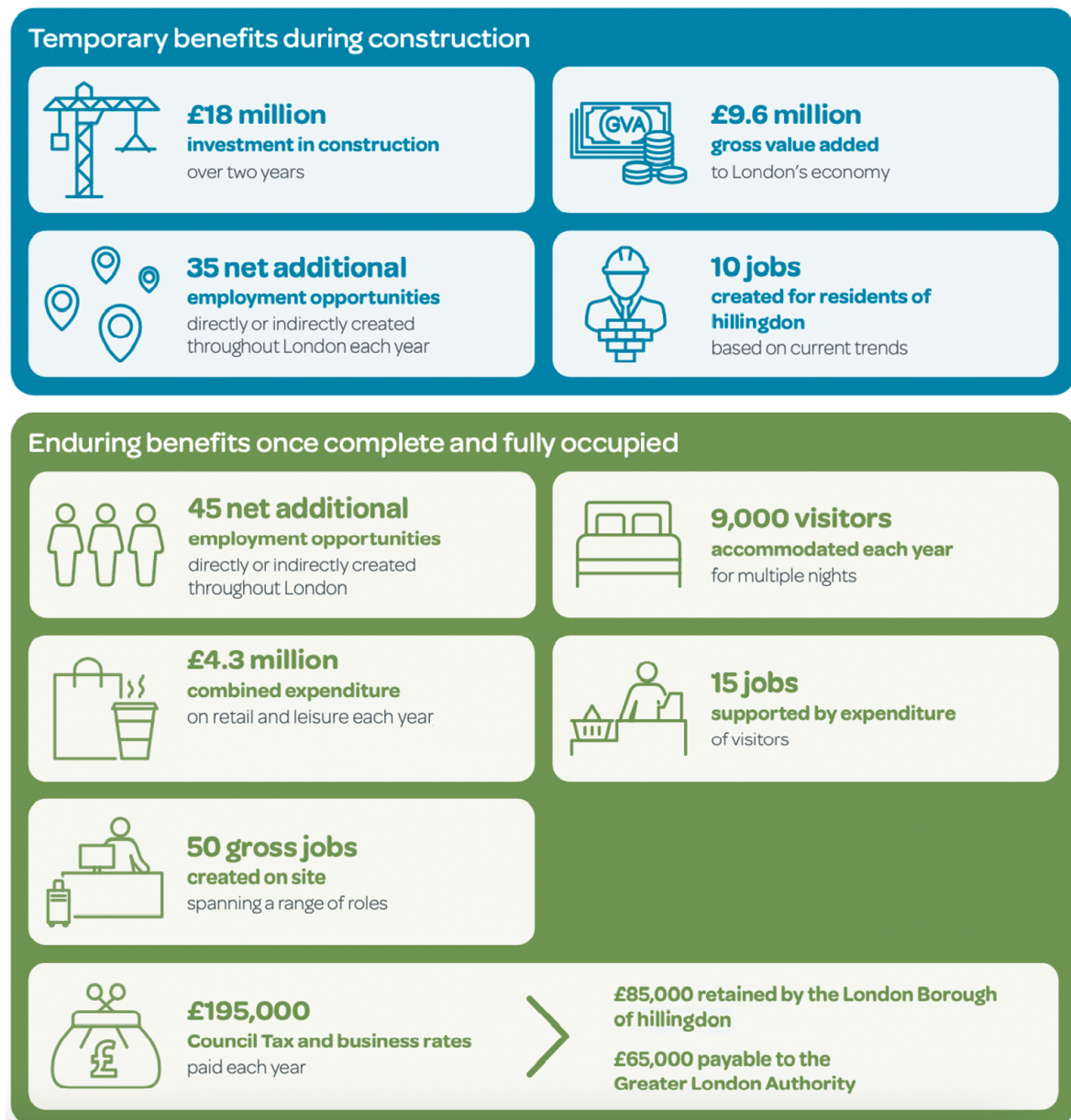
1. An increase in the number and layout of the rooms within the extension to the hotel – increase from 108 to 128 rooms.
2. An increase to the size of the basement level
3. Use of the roof level and installation of dormers to increase the total of rooms

Given the nature of the changes that would potentially change the description of the original development, it was deemed by Council Officers that the scope of the changes would fall outside of a Minor Material Amendment (Section 73 application). Hence this planning application has been submitted to regularise the development.

The proposals relate to an extension to an existing hotel to which a similar extant approval was secured. Therefore, the principle of extending an existing hotel to provide additional traditional hotel rooms should be acceptable in principle and will generate business rate contributions for the borough and increase jobs and enhance the economy.

Policy E10 of the London Plan 'Visitor Infrastructure' states that a sufficient supply and range of serviced accommodation should be maintained. In outer London, serviced accommodation should be promoted in town centres and within opportunities areas where they are well connected by public transport, particularly to central London. The site is situated on Bath Road which is a major commercial road leading to Heathrow airport and tube/rail stations.

An Economic Statement prepared by Total Economics compiled a summary of the forecasted economic benefits of the scheme which are below. The public benefits are even more significant than the consented and extant hotel extension. This should weigh in favour of the enhanced proposals.



Total Economics summary of economic benefits of the scheme

There is Local, London Plan and national support for making more efficient use of sustainable, underutilised buildings/land especially in areas of good PTAL ratings such as this which is 4.

The extension to the existing hotel will provide significant employment growth and enhance the vitality locally of businesses.

The development is considered to sit comfortably in the streetscences with no issues arising with regard to any impact on neighbours.

The quality of the new / expanded hotel accommodation will meet and exceed modern standards to the benefit of future users and residents.

The transport impacts of the scheme have been appropriately considered and these have been designed to minimise and reduce any impact.

Overall, the approach to this development would reflect the 12 core principles of sustainable development as set out in the NPPF. The application scheme meets the strategic policy objectives of the London Plan as well as the aims and objectives of Council's adopted and emerging Local Plan.

The Site

The site is occupied by a former office building that has been converted to a hotel. Planning permission was also granted for an extension to the previous office building which provided an extra storey and facilitated ancillary uses including a gym to the hotel. The building / extension that this application relates to would be positioned within an area to the rear that was previously in use as a car park for the original office development and then hotel. The building is broadly square and is largely symmetrical.

The elevation walls consist of glazing running from floor to eaves height broken up by a number of narrow vertical red brick pillars. The red brick plinth follows along the base of the building. The roof is tiled with a shallow sloped false hipped design with plant and machinery mounted on the interior flat roof. There is a central gable ended glazed atrium concealed within the overall roof line.

Heathrow Point West is situated on the North side of Bath Road (A4) north of Heathrow Airport which is located to the south of the A4.

Heathrow Point West is a three storey building, last used as offices, totalling approximately 5,096.7 sq m, located on a site with an area of 0.9 hectares. Boltons Lane lies to the west of the site boundary and Mondial Way to the north. The site bounded on the east by Amadeus Building and Samsonite House, both offices. The main access to the site is from the junction of Boltons Way and Mondial Way.

The building is set within a well-planted site, with tree and shrubs / hedges around all boundaries and between the two car parks, situated to the north and west of the building. However, some of the planted areas are tired-looking / suffering from a lack of maintenance and are in need of rejuvenation. The site lies within the proposed Heathrow Archaeological Priority Zone.

Proposed Development

The proposal is for erection of a new 4 storey hotel extension building with accommodation at roof and basement levels to provide 128 room with covered link bridge to existing hotel building associated with ancillary works.

This application follows formal pre-application engagement with the Council on regularising works that were not in accordance with a previous consent for the site for a 108 room extension. In 2016, planning permission ref: 41331/APP/2016/1035 (Erection of a 4 storey hotel extension building to accommodate 108 rooms with a covered link bridge to existing hotel building associated with ancillary works) was granted and the development was subsequently implemented.

The size and shape of the development is very similar to this consented and extant scheme. The only significant changes from this previous consent are as follows:

4. An increase in the number and layout of the rooms within the extension to the hotel – increase from 108 to 128 rooms.
5. An increase to the size of the basement level
6. Use of the roof level and installation of dormers to increase the total of rooms

Planning History

This planning application follows formal pre-application engagement with the Council on how best to regularise the changes to the development following commencement of planning permission ref: 41331/APP/2016/1035 for '*Erection of a 4 storey hotel existing building to accommodate 108 rooms with a covered link bridge to existing hotel building associated with ancillary works*'.

The size and shape of the development is very similar to this consented and extant scheme. See approved drawings below.



Approved development being built out

A fuller history of relevant planning applications has been set out in the table below.

Application Ref	Date	Description	Decision
41331/APP/2017/111	08-03-2017	Erection of a new 4th floor extension to the existing building (being converted as a hotel) to accommodate a gym, admin offices and plant room	Approved
41331/APP/2016/1035	02-11-2016	Erection of a 4 storey hotel extension building to accommodate 108 rooms with a covered link bridge connecting the existing building, with associated ancillary works.	Approved
41331/APP/2015/1886	26-08-2015	Change of use from Offices (Use Class B1(a)) to provide a 159 bedroom hotel (Use Class C1) and the erection of a new single storey side extension, car parking and landscaping.	Approved

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon's Local Plan comprising a Core Strategy and Development Management Plan; the London Plan; the NPPF; and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

NPPF (2024)

The key chapters applying to this application are:

2. Achieving sustainable developments – Paragraphs 7 to 14
3. Plan-making – Paragraphs 15-38
4. Decision-making – Paragraphs 39 to 60
5. Delivering a sufficient supply of homes – Paragraphs 61 to 81
6. Building a strong, competitive economy – Paragraphs 85 to 87
7. Ensuring the vitality of town centres – Paragraphs 90 to 95
8. Promoting healthy and safe communities – Paragraphs 96 to 108
9. Promoting sustainable transport – Paragraphs 109 to 118
10. Supporting high quality communication – Paragraphs 119 to 123
11. Making effective use of land – Paragraphs 124 to 130
12. Achieving well-designed places – Paragraphs 131 to 141
13. Protecting Green Belt land – Paragraphs 142 to 160
14. Meeting the challenge of climate change, flooding and coastal change – Paragraphs 161 to 186
15. Conserving and enhancing the natural environment – Paragraph 187 to 201
16. Conserving and enhancing the historic environment – Paragraph 202 to 221

Local Plan Designation and London Plan

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

Part 1 Policies:

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

Part 2 Policies:

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

DMT 2 Highways Impacts
 DMT 6 Vehicle Parking
 LPP D1 (2021) London's form, character and capacity for growth
 LPP D11 (2021) Safety, security and resilience to emergency
 LPP D12 (2021) Fire safety
 LPP D13 (2021) Agent of change
 LPP D14 (2021) Noise
 LPP D3 (2021) Optimising site capacity through the design-led approach
 LPP D5 (2021) Inclusive design
 LPP D9 (2021) Tall buildings
 LPP E10 (2021) Visitor infrastructure
 LPP G5 (2021) Urban greening
 LPP G6 (2021) Biodiversity and access to nature
 LPP GG2 (2021) Making the best use of land
 LPP GG5 (2021) Growing a good economy
 LPP HC1 (2021) Heritage conservation and growth
 LPP SD1 (2021) Opportunity Areas
 LPP SD6 (2021) Town centres and high streets
 LPP SD7 (2021) Town centres: development principles and Development Plan Documents
 LPP SD8 (2021) Town centre network
 LPP SI1 (2021) Improving air quality
 LPP SI12 (2021) Flood risk management
 LPP SI13 (2021) Sustainable drainage
 LPP SI2 (2021) Minimising greenhouse gas emissions
 LPP SI3 (2021) Energy infrastructure
 LPP T1 (2021) Strategic approach to transport
 LPP T2 (2021) Healthy Streets
 LPP T3 (2021) Transport capacity, connectivity and safeguarding
 LPP T4 (2021) Assessing and mitigating transport impacts
 LPP T5 (2021) Cycling
 LPP T6 (2021) Car parking
 LPP T6.1 (2021) Residential parking
 LPP T6.4 (2021) Hotel and leisure use parking
 LPP T6.5 (2021) Non-residential disabled persons parking
 LPP T7 (2021) Deliveries, servicing and construction
 LPP T8 (2021) Aviation

Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

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

The Local Plan: Part 1 - Strategic Policies (2012)
 The Local Plan: Part 2 - Development Management Policies (2020)
 The Local Plan: Part 2 - Site Allocations and Designations (2020)
 The London Plan (2021)
 The West London Waste Plan (2015)

Principle of Development

The proposal is for erection of a new 4 storey hotel extension building with accommodation at roof and basement levels to provide 128 room with covered link bridge to existing hotel building associated with ancillary works.

The principle of a hotel use on the site has been established by virtue of planning permission ref:41331/APP/2015/1886, for a change of use from offices to a hotel on the main building.

Subsequently, the principle was established through planning permission ref: 41331/APP/2016/1035 for *'Erection of a 4 storey hotel existing building to accommodate 108 rooms with a covered link bridge to existing hotel building associated with ancillary works'*.

In terms of the intensification of use, Table 5.3 (Heathrow Opportunity Area) of the Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012) notes that there is particular pressure on employment land for hotel uses in the Heathrow area. Accommodating hotel growth must not be at the expense of employment land around Heathrow Airport and as such, hotel development will be directed to locations outside the airport boundary and outside of designated employment areas.

Policy E1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (Adopted November 2012) safeguards Locally Significant Industrial Sites on the Heathrow perimeter. However, the application site does not fall within any of the designated locally significant industrial sites along Bath Road. In addition, Policy T4 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) states hotels, guest houses and other tourist accommodation will be acceptable in principle provided:

- (i) The development is located within a mixed use area; and
- ii) The development is located near or on a primary or secondary road or rail or underground station; and
- (iii) The development does not result in the loss of amenity to neighbours through noise and other disturbances; and
- (iv) Parking to standards adopted by the local planning authority can be met within the curtilage of the site.
- (v) Any on street parking that may be generated can be accommodated without detriment to the free flow of traffic or conditions of general highway safety.

The development is considered to comply with the above mentioned criteria and in light of the site's location and the adequate car parking provision (refer to section 7.10 of the report), it is considered that the scheme is acceptable in principle when assessed against Local Plan part 2 Policy T4.

The proposals now seeks consent for a 128 room hotel extension buildings comprising 4 storeys with accommodation in the roof and at basement levels.

Policy DME 5 (Hotels and Visitor Accommodation) of the Local Plan Part 2 – Development Management Policies states that 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.

The subtext to Policy DME 5 clarifies that the Heathrow is not identified as hotel growth location in the Local Plan Part 2 to ensure consistency with the Airports National Policy Statement. It is noted that the site lies outside of the land on which the proposed third runway and expansion of infrastructure associated with Heathrow Airport would be sited. It is however strongly recommended that consultation is carried out with Heathrow Airport prior to the submission of any planning application. The Airports National Policy Statement (2018) would also be a material planning consideration.

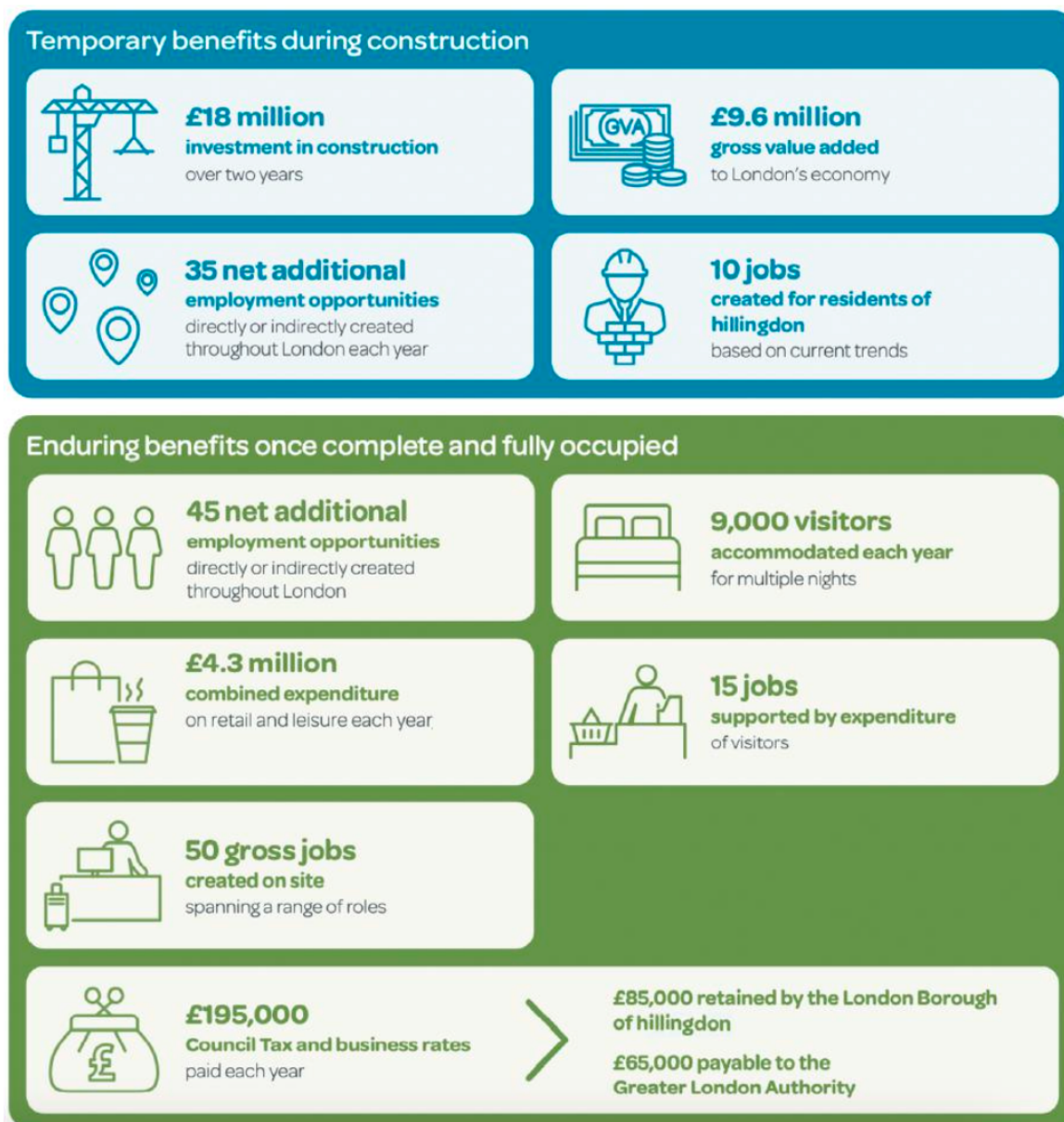
Hotels are considered to be a main town centre use. The proposed hotel extension would not be within a town centre, nor would it be within a site allocated for such uses within the Local Plan. It is noted that the development site would be broadly within the Heathrow Opportunity Area (which whilst not 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 sites 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, a separate Sequential Test Statement has been prepared to accompany this application that demonstrates compliance with policy E10.

Notwithstanding this, there is significant need for hotel space in and near to Heathrow airport. It is acknowledged that the existing hotel is used for asylum seekers as part of a contract with the Home Office, however, they are expected to vacate in late 2026 and the existing building will undertake renovation works and repair to accommodation traditional hotel users related to the airport. The new extension is expected to be brought into use at the same time as this and the future accommodation will not be used for asylum seekers. The Applicant would be satisfied to have a condition imposed on any planning permission restricting the occupation of all rooms to a maximum of 90 days in line with traditional hotel use.

Making more efficient use of this existing hotel site for expanded visitor accommodation should be welcomed and having the whole site re-used for its lawful use should be supported as it will reduce any perceived adverse impacts on neighbouring amenity.

This application is accompanied by an Economic Report prepared by Total Economics which set out a summary of the forecasted benefits of the scheme which are below. The public benefits are significantly greater than the consented and extant hotel expansion. This should weigh in favour of the enhanced proposals.



Total Economics summary of economic benefits of the scheme

As mentioned the separate Sequential Test Statement should be read alongside this Planning Statement to demonstrate the acceptability of the scheme in terms of its principle, but in general planning terms, the expansion and improvement of existing hotel site for more visitor accommodation should be welcomed as making more efficient use of a highly sustainable site. It will deliver significant economic benefits to the area and the local council and will generate wealth and jobs.

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.

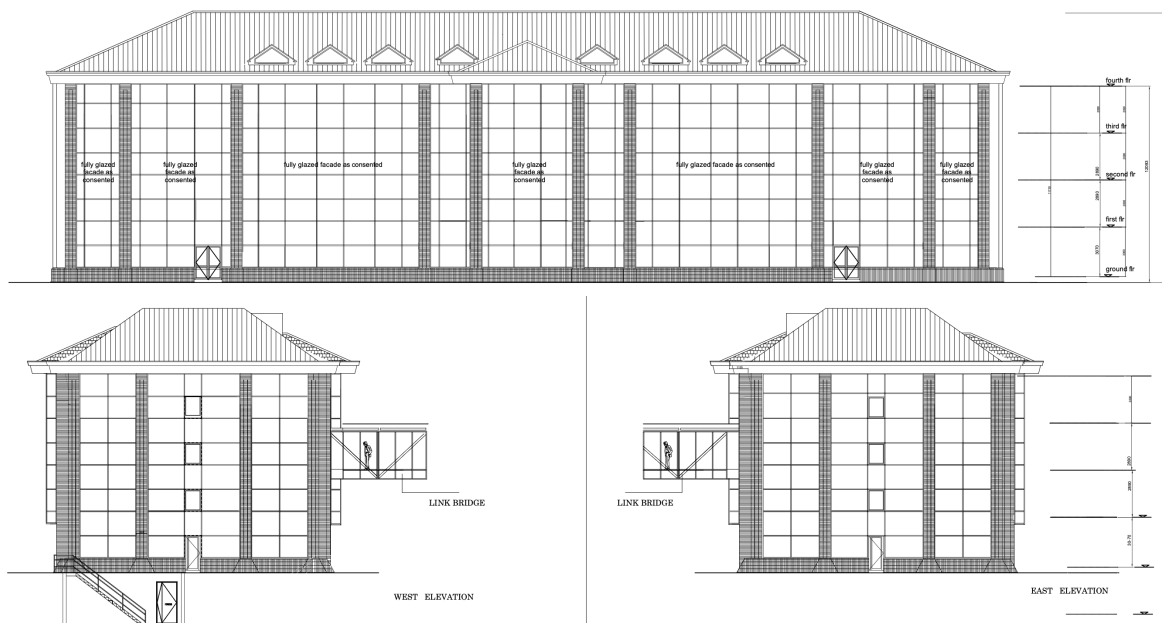
C) Development will be required to ensure that the design safeguards the satisfactory redevelopment of any adjoining sites which have development potential. Regarding proposals for major development sites, the Council expects developers to prepare master plans and design codes and agree on these with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

The design approach broadly follows the previously consented design with the exception of the basement and the addition of the relatively small dormer windows. The alterations to the consented extension are minor in the context of the approved scheme and neither the basement or dormers would appear as prominent features within the street scene. The scale of the extension is commensurate with the existing building and notwithstanding the addition of the basement is consistent

with the consented plans. The form and architectural features match those of the existing building. The site sits within the context of late 20th century office buildings of a similar scale and the design, scale and siting would not appear out of place within this context (see elevations below).



Proposed Elevations with dormers

Sufficient separation is retained between the extension and existing dwellings on Doghurst Avenue and Bolton's Lane to ensure that the building does not appear overbearing in relation to the most scale of the two-storey residential dwellings to the north west. The extension would be sited to the rear of the existing building and would not be prominent in public views from Bath Road, aside from glimpsed views looking north east from the junction with Boltons Lane. In summary, accounting for the context of the site, the design of the existing building and the minimal prominence of the changes compared with the consented plans, the design approach is considered acceptable.

To meet the requirements of London Plan Policy E10, 9% of the proposed hotel units will be fully accessible to wheelchair user guests. A further 1% (1 unit) would be fitted with a tracked hoist system. The ensuite bathrooms within the Universal Access units will feature a mixture of bath tub and showers, giving wheelchair users a choice over which option best suits their personal accessibility requirements. The building and all its facilities will comply with recognised accessibility standards. These facilities include provisions in the car park, access routes into the building, entrances, catering and hospitality areas, toilet facilities, step-free access to upper floors, communication systems, lighting, signage for legibility throughout the building, and accessible accommodation. The supporting Design and Access Statement will detail how the provisions of accessibility and inclusion have been incorporated into the design.

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

A Fire Strategy accompanies this application that considered all fire related considerations of the scheme. It concludes that the layout of the building is considered sufficient to meet the functional requirements of the Building Regulations, provided that the recommendations made throughout the Fire Strategy report are incorporated in full.

Flood Risk and Drainage

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) has been prepared and submitted alongside this application.

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 is given to utilising the drainage options in the SUDS hierarchy which remove the key pollutants that hinder improving water quality in Hillingdon.

The accompanying Flood Risk Assessment is considered to demonstrate that the proposal would not lead to any risk of flooding to future users or increase flood risk elsewhere.

Impact on neighbours

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 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 siting of the building affords appropriate separation to the nearest residential dwellings to the west at Doghurst Avenue and Bolton Avenue such that there is siting of the development is unlikely to impact negatively on the amenity of these properties by reason of overlooking or overshadowing/loss of light. In relation to the impact on daylight and sunlight, a Daylight and Sunlight Report has been carried out to demonstrate that the proposals would not impact neighbours. Please refer to this document for more details of how the proposals would not adversely impact neighbours.

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.

A Noise Impact Assessment accompanies this application that demonstrates that the amenity of neighbouring properties would be safeguarded and the future users of the hotel extension would have an acceptable level of internal accommodation which would be protected from external sources of noise. On this basis, the proposal would be acceptable with regards to noise. Please refer to this document for more details.

Quality of the 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.

With this in mind, the accompanying Daylight and Sunlight Assessment assesses the quality of daylight to all accommodation including to the basement levels. All rooms are considered to benefit from adequate levels of daylight for the proposed use. Although outlook to the basement rooms would be restricted, the quality of the internal accommodation with the reasonable levels of natural daylight are considered to provide a good standard for temporary accommodation. On this basis, the proposals are considered to provide adequate future accommodation for users.

Transport

This application is accompanied with a Transport Statement which considers transport matters in detail and should be read alongside this statement.

NPPF Paragraph 109 outlines that transport issues should be considered from the earliest stages of plan-making and development proposals. This should involve: (c) understanding and addressing the potential impacts of development on transport networks; (d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation the scale, location or density of development that can be accommodated; and (e) identifying pursuing opportunities to promote walking, cycling and public transport use.

NPPF Paragraph 112 set out that if setting local parking standards for residential and non-residential development, policies should take into account: (a) the accessibility of the development; (b) the type, mix and use of development; (c) the availability of and opportunities for public transport; (d) local car ownership levels; and (e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

Policy T1 Strategic approach to transport of the London Plan states that all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

Policy T4 Assessing and mitigating transport impacts of the London Plan states that the cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public

health, should be taken into account and mitigated. Also, development proposals should not increase road danger.

Policy T5 Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people chose to cycle.

Policy T6 of the London Plan and Table 10.3 sets out that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Part B sets out that “Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking (‘car-lite’). Car-free development has no general parking but should still provide disabled persons parking in line with Part E of this policy.

London Plan T6 goes on to state that “where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles in line with Policy T6 .1 Residential parking, Policy T6.2 Office Parking, Policy T6 .3 Retail parking, and Policy T6 .4 Hotel and leisure uses parking. Additionally, T6 outlines that “where sites are redeveloped, parking provision should reflect the current approach and not be re-provided at previous levels where this exceeds the standards set out in this policy”.

The general car parking and servicing arrangements are not materially changing from the extant consent which were considered acceptable by the local Highway Authority. There is a modest increase in rooms, but general parking standards have decreased and there have been more encouragement of alternative modes of transport to the private motor vehicle since this time. The arrangements as set out in the accompanying Transport Statement are considered to ensure there would be no adverse impact on the surrounding highway network and that no highway safety issues would arise.

Adequate levels of car parking and cycle parking would be provided and the proposals would not discourage use of the private motor vehicle and take a sustainable approach to transport.

The scheme is providing 20% active and the remaining as passive charging points. The London Plan T6.1 states that “All residential car parking spaces must provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces.” The Applicant has proposed active and passive vehicle charging points in line with this standard.

Sustainability and Carbon Reduction

Policy SI2 Minimising greenhouse gas emissions of the London Plan states that development proposals should make the fullest contribution to minimising carbon dioxide emissions.

An Energy and Sustainability Report has been prepared to consider the sustainability of the scheme. It explains that the total reduction in emissions from energy efficiency, low carbon and renewable technologies are calculated as achieving greater than a 35% reduction in carbon emissions. This is achieved through a range of be lean, be clean and be green measures.

After the overall reductions through the measures proposed are factored in, the remaining emissions would need to be offset and secured by S106. This approach with the measures set out in the accompanying Suitability and Energy Statement would meet local, regional and national planning policy by achieving the London Plan target to achieve a minimum 35% CO₂ reduction over the baseline using the new draft SAP10 carbon factors.

Designing Out Crime

Policy D11 of the London Plan 'Safety, security, and resilience to emergency' states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. Such measures have been considered at the start of the design process which ensures they are inclusive and aesthetically integrated into the development and the wider area.

The approach to this development is similar to the extant scheme.

As with the previous consented scheme, it is expected that no significant designing out crime issues are likely to arise and that a condition requiring 'Secured by Design' accreditation award be obtained by the DOCO from the MET prior to first occupation of the development. Subject to this condition, the Council should have no concerns in this regard and the development would meet the requirements of policy D11 of the London Plan.

Archaeology

London Plan HC1 sets out that "Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area."

Local Plan Policy LP 7 Archaeology sets out that "the Council will seek to protect, enhance and promote its archaeological heritage (both above and below ground), and will encourage its interpretation and presentation to the public." Desk based assessments and, where necessary, archaeological field evaluation will be required before development proposals are determined, where development is proposed on sites of archaeological significance or potential significance.

An archaeological watching brief accompanies this application which demonstrates that the development that has been carried out has found nothing of significance and that an archaeological specialist monitored the ground works and ensured there were no finds and that the development resulted in no harm in this regard. Therefore, the Council and GLAAS should be satisfied that the development causes no harm.

BNG / Trees

The submission is accompanied by an Arboricultural Impact Assessment. This section of the statement should be read in conjunction with this report. It sets out protection measures that were applied during construction and will continue to be applied to ensure that the existing trees on site are protected. As is evident from

the construction works on site, the trees around the extension building have been safeguarded and there has been impact to their health.

This application is also accompanied by a BNG assessment which demonstrates that the proposed plans, habitat creation, and offsite offsetting will achieve a net gain of 10.18% in Habitat Units, and a net gain of 322.16% in Hedgerow Units. Therefore, the proposals will comply with national planning policy and guidance with regards to biodiversity improvement.