



# Response to Design and Landscape Comments

## 41632/APP/2025/2468 – HEATHROW FLIGHTPATH CAR PARK

### 1 Introduction

- 1.1 This consultation response has been prepared by Quod on behalf of Lysara ('the Applicant') in response to consultee comments received from the Hillingdon Urban Design and Landscape comments on application ref: 41632/APP/2025/2468. The application is for (1) Full planning permission for the creation of a mixed use sustainable vehicle parking facility (Sui Generis) and food and beverage unit (Class E), alongside ancillary welfare and staff buildings, and other supporting infrastructure and site levelling; and (2) Outline planning permission for a future extension to the facility, with all associated matters reserved except for access ('the Proposed Development') at Heathrow Flightpath Car Park, Bath Road, Sipson ('the Site').
- 1.2 This response provides a summary of the comments received and the Applicant's response to these.

### 2 Response to Consultee Comments

- 2.1 The key elements to address in the consultation response received from Urban Design and Landscape have been extracted into **Table 1** below, along with the Applicant's responses.

Table 1: Response to Consultee Comments

Consultee Comment	Applicant Response
<p>The proposals include the removal of two tree groups along Bath Road frontage which are the remnants of a continuous tree belt divided to achieve the new vehicular access (application number 41632/APP/2021/1301).</p> <p>The removal of these trees visually exposes the site from Bath Road to deliver a prominent commercial Food and Beverage frontage. As well as delivering clear views into the site of cycle shelter, car parking, canopies and other utilitarian infrastructure on the eastern side of the access road.</p> <p>Removing the tree-lined belt and replacing it with views of car parking is detrimental to the townscape because it results in the loss of visual softness and</p>	<p>It should be noted from the outset that there is no consistent character along the frontage of Bath Road. Whilst the Site historically benefitted from a larger tree belt at the south, this has been impacted through the construction of the new access approved under application ref: 41632/APP/2021/1301. The remaining trees are of low landscape, amenity and ecological value and provide no positive contribution towards the character of the wider area.</p> <p>The Leonardo Hotel and residential properties to the west are predominantly fronted by grassland and sporadic street trees, which do not provide any significant visual amenity value. The commercial properties to the south associated with Heathrow Airport do not benefit from any greening or tree screening. As such, the loss of the trees along the Bath Road frontage on Site will have no negative impact on the townscape.</p>



## Note continued

Consultee Comment	Applicant Response
<p>natural screening. Their removal exposes large expanses of hard surfacing and vehicles, introducing a more utilitarian and visually intrusive environment.</p> <p>Further, the removal of the green frontage eliminates the green transition to the residential houses adjacent to the site on the western boundary exposing the eastern flank of the residential building. Adjacent to this residential building it is proposed to locate a bin store and large 9m high signage totem.</p> <p>Revised options are required to mitigate visual impacts of the proposal. Should this issue be resolved the increased built form on the site would be considered acceptable.</p>	<p>Whilst it is acknowledged that the loss of the trees on the frontage will enable visibility of the proposed F&amp;B unit, this is necessary from an operational perspective to ensure it is visible from Bath Road to attract customers. This approach was discussed and agreed at pre-app stage. Furthermore, exposing the F&amp;B unit, which will be a high quality and well-designed commercial unit, will have a positive impact on the urban and commercial townscape, and allowing views into the Site from Bath Road is not considered to be harmful.</p> <p>The Proposed Development includes replacement tree planting, grassland, bulb planting across the wider site and mixed native hedge along the Bath Road frontage, which will help to soften the road frontage and will be more aligned to the surrounding green frontages along the rest of Bath Road (in addition to making a significant contribution towards achieving 10% Biodiversity Net Gain ('BNG')). This is considered entirely appropriate for the character of the area and the nature of the Proposed Development.</p>
<p>Currently, there is insufficient justification for the removal of G7 and G6. While these are low category tree groups they play an important function within the townscape visually screening the car park. Additionally, it has not been demonstrated that adequate replacement tree planting has been proposed to comply with the London Plan Policy G7 Trees and Woodlands, which states:</p> <p><i>"If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for</i></p>	<p>The removal of tree group G7 is required to facilitate the construction of the F&amp;B unit. As set out above, this is the optimum location for the F&amp;B unit from an operational perspective to attract a tenant, and will be consistent with the commercial context. The removal of tree group G6 is also required as it sits above the existing wayleave. The removal of both groups is also required from a highways perspective to allow appropriate visibility splays into and out of the Site, to allow the approved access from Bath Road to function effectively.</p> <p>Despite the loss of G6 and G7, the landscape planting proposed within the Site replaces a large area of hardstanding with a combination of hardstanding and greenspace, representing ecological and landscape betterment to the existing Site. The applicants have balanced the need for proposed tree planting against existing</p>



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Consultee Comment	Applicant Response
<p><i>example, i-Tree or CAVAT, or another appropriate valuation system."</i></p> <p>The phase 2 layouts show areas of green space that has the potential to host replacement tree planting, this needs to be included within this application to give certainty replacement trees can be accommodated on site.</p>	<p>constraints (including the wayleave, available space/suitable soft landscaping areas and existing RPZs). It is also proposed to include an area of woodland planting matrix, more standard native trees and a number of extra heavy standard proposed trees as part of Phase 2. A detailed Phase 2 Landscape Plan will be prepared as part of the submission of Reserved Matters for the rear portion of the Site, which will refine this detail.</p>
<p>Further the landscape proposals show hedge planting under the canopies of trees along the eastern boundary very close to the tree trunks.</p> <p>Planting hedges under existing tree canopies is generally unsuitable due to competition for water and nutrients, low light levels, and dry soil conditions, which hinder hedge growth. It can also damage tree roots during planting, create maintenance difficulties, and lead to poor long-term health for both the tree and hedge.</p>	<p>WSP drawing ref: 0586-WSP-XX-XX-DR-L-1011-S2-P02 contains the specific detail for how the hedges planted under the tree canopies will function. The are details produced with the intention that intrusion and potential impacts on roots will be minimised.</p> <p>The hedgerows also provide a significant contribution towards the BNG across the Site, and their removal would have a negative impact on this element of the scheme.</p>
<p>Additionally, a boundary fence is proposed well within the root protection zones of all the boundary trees. Boundary fences should not be located close to tree trunks within Root Protection Zones (RPZs) because construction can damage roots, compact soil, and stress the tree, potentially leading to decline or instability.</p> <p>The limited space remaining around the site beyond the hedge planting is grassland with some bulb planting.</p> <p>The landscape proposals should be revised to take account of the comments above with more space dedicated to landscape to avoid the issues raised.</p>	<p>The proposed boundary fencing has been designed to ensure there will be no harmful impacts on the RPZs. The need for boundary fencing for security purposes needs to be balanced against the protection of the boundary trees in this instance, which has resulted in the proposed fencing.</p> <p>Furthermore, Appendix D of the submitted Arboricultural Impact Assessment contains guidance on the intended appointment of an Arboricultural Clerk of Works ('ACoW') for the construction stage, including the installation of new fencing within RPZs.</p> <p>Notes on fencing from within this section are as follows:</p>



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	<p><b><i>"INSTALLATION OF NEW FENCING WITHIN ROOT PROTECTION AREAS</i></b></p> <p><i>On-site walkover assessment is to be undertaken by the relevant contractor and ACoW prior to construction, to identify whether bespoke fencing is required to accommodate installation within RPAs and mitigate potential root damage.</i></p> <p><i>Excavations within RPAs shall be undertaken under the direct supervision of the appointed ACoW.</i></p> <p><i>Post holes shall be excavated manually using hand tools and lined with joined visqueen or similar impervious membrane, to prevent leaching of materials associated with installation of fence post footings.</i></p> <p><i>Post holes to be re-positioned to avoid and retain large diameter (i.e. &gt;25mm diameter) roots encountered during hand-digging of post holes."</i></p> <p>The Applicant is willing to accept a condition to ensure these measures are undertaken to prevent damage to the RPZs.</p>

### 3 Next Steps

3.1 In light of the above commentary provided by the Applicant, we would please request that the Urban Design and Landscape team review the responses and provide any further comments responding to the Applicant's queries and comments, or agreement the approach taken is appropriate. The Applicant is keen to work proactively with Hillingdon to resolve these matters promptly and arrive at an appropriate solution for both parties.



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