PROGRESS PLANNING

Land On The South Side Of Bath Road, Harlington, Hayes UB3 5AY

Planning Statement

Prepared by Progress Planning on behalf of:

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Executive Summary

This Statement is submitted in support of a full planning application for the erection of a hotel building comprising 157 rooms with associated access, parking and landscaping. We consider that the changes inherent in the development, principally the additional storey, implications of parking and fenestration changes, raise no new issues not already found acceptable when considering the extant consent.

The accompanying documentation demonstrate that the additional story would only marginally increase the overall height and massing of the building above that consented. This relatively small change in the overall scale of the development would not have a demonstrable impact on the appearance of the wider street scene of (in particular) Bath Road or the residential amenities of occupiers of Axis House or Doghurst Avenue.

The on-site parking provision would continue to be acceptable for purpose, little different to the quantum of parking seen at immediately adjacent hotels. When coupled with the provision of funding towards the Hoppa bus service, accessibility by public transport and the highly likely purpose of the hotel being used in association with the airport, the parking provision is considered to be entirely acceptable rendering the scheme in continued compliance with applicable Development Plan requirements.

The development would have a high-quality design which would add visual interest to the street scene replacing a large gap in the otherwise built up frontage evident presently whilst enhancing the local character.

Changes in articulation and architectural treatment reinforce the contemporary design with a strong horizontal rhythm emphasised by type of cladding, windows and other architectural elements. The development would provide a suitable transition in height and scale from neighbouring buildings/development. It is considered that the resulting building would sit comfortably within the site and would not adversely impact the character and appearance of the area.

The proposal can be appropriately accommodated in this location without appearing overbearing on the surrounding area or unacceptably detracting from the amenities of adjoining occupiers by reason of loss of light, privacy, or outlook.

Subject to a legal agreement, the proposal would not raise any issues relating to highways implications.

It is considered that the revised scheme complies with the Development Plan and is capable of receiving support and consent.

The Site

The site is located on the north side of Bath Road close to the junction with Sipson Road which is located to the west, and Bolton's Lane to the east. Egerton Road runs across the north boundary from which there is pedestrian and vehicular access to the site. The site is on the opposite side of the Bath Road to that of a substantial built form of the Renaissance London Hotel, to the east of the 4 storey Strata House and west of the 3 storey Axis House. Beyond the Renaissance Hotel to the south is the Northern Perimeter Road with Heathrow Airport beyond. The locality is also dominated by the infrastructure associated with the Airport and a large number of substantial commercial buildings including many large to very large hotels.

To the north, residential properties which front Doghurst Avenue abut Egerton Way. These properties principally comprise semi-detached houses interspersed with a few detached properties. The properties are all typical London inter war suburban 2 storey properties, are set behind an established row of hedging/treescape in the height order of 4m and more.

The Bath Road east of the junction with Sipson Road exhibits a high concentration of substantial commercial and residential buildings including many hotels. Buildings are generally of the large to very large scale with varying sizes, widths, heights and appearances evident. Read from west to east from the Bath Road/Sipson Road junction, there is a garage with canopy forecourt, immediately adjacent to the 4 storey flat roofed Ibis Styles Hotel, the 4 storey dummy pitched roof Strata House, the application site, the 3 storey fully pitched Axis House and then Bolton's Lane. The site sits approximately centrally within this row which assists integrate the stepped form up & down again between the two aforementioned roads off Bath Road.

The site is in a location easily accessible by public transport with good access to the underground and bus routes – this reality is reflected in the sites relatively high PTAL rating of 4 ('good'). Bath Road is part of the A4 which is a district distributor road running between Cranford in the east and Slough in the west. In the vicinity of the site the A4 is a dual carriageway although one lane each way is a bus lane (with cycles and motorways permitted). The nearby Bath Road/Sipson Road intersection is a major signal controlled junction with five arms. The Transport Statement considers the sites accessibility credentials in greater depth.

Egerton Way is an unattractive service road being poorly landscaped commonly used for informal parking by the taxi industry. The proposal would formalise elements of the available parking to the benefit of the locality generally.

Planning History

The site has a planning history of consented stand-alone hotel developments which are as follows:

<u>43794/APP/2017/3704</u>
Erection of a 5-storey 128 bedroom hotel including the excavation of a basement to provide 50 car parking and associated landscaping. Consent granted 2nd July 2018.

<u>43794/APP/2018/2779</u>
Erection of a 6 storey 157 bedroom hotel including plant room on the roof, the excavation of a basement to provide car parking and associated landscaping. Consented granted 3rd April 2020.

As highlighted above, there is extant planning permission for a 6 storey 157 bedroom hotel, including plant room on the roof. This application seeks a modest increase of hotel rooms to 159.

Proposed development

The proposal is for erection of a hotel building comprising 157 rooms and associated access, parking, landscaping and refuse storage.

In considering this description/the proposal it is very important to appreciate the fall-back position of the consented 157 room hotel. The changes in this

application compared to that consent are limited with the principal differences being:

- Removal of excessive basement car park
- Provision of car parking at undercroft level
- Provision of an additional coach parking space and improved coach layby
- Additional storey in height

The proposal would carry forward many of the design aspects of the consented scheme and have an almost identical footprint, width, depth, and be only marginally taller.

The proposal includes public realm enhancements to Egerton Way, spaces bordering the buildings and to the Bath Road frontage.

The accompanying supporting documentation includes an updated Transport Statement, Drainage Strategy, Tree Report, sunlight/daylight flow analysis, Air Quality Assessment and drainage strategy. The documentation demonstrates the continued acceptability of the proposal against the Development Plan.

Changes to the extant consent are considered limited to the principal consideration of the additional storey and lesser considerations including fenestration revisions. However collectively the changes are contended to raise 4 basic considerations – the acceptability of the additional height, the resultant impact of the same on amenity levels, parking considerations and the appearance of the development within the street scene. It is contended that all other matters have been accepted via the extant consent.

Planning Policy

The proposed development would be assessed against the Development Plan Policies contained within Hillingdon's Local Plan: Part 1 & 2, the London Plan, the NPPF and supplementary planning guidance by both the London Borough of Hillingdon and GLA.

National Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF) under paragraph 11 states decisions should apply a presumption in favour of sustainable development and 11(c) stipulates that for decision taking this means approving development proposals that accord with an up to date development plan without delay.

Paragraph 38 stipulates that local planning authorities should approach decisions on proposed development in a positive and creative way. Decision-makers at every level should seek to approve applications for sustainable development where possible.

Chapter 6 of the NPPF refers to *''Building a strong, competitive economy'*. Paragraph 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of

the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

Paragraph 83 of the NPPF states that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

Chapter 9 of the NPPF refers to *'Promoting sustainable transport'*. Paragraph 105 states that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan- making and decision making.

Within this context, paragraph 112 states that applications for development should:

a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
d) Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Paragraph 113 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

Chapter 12 of the NPPF refers to *'Achieving well-designed places'*. Paragraph 126 states 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 aspects 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.

Paragraph 130 states that planning policies and decisions should ensure that developments:

a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
f) Create places that are safe, inclusive and accessible and which promote health and well being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Paragraph 134 states that significant weight to development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and or outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area as long as they fit in with the overall formal and layout of their surroundings.

Chapter 14 of the NPPF refers to *'Meeting the challenge of climate change, flooding and coastal change'*. Paragraph 154 states that new development should be planned for in ways that:

a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
b) Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Chapter 15 of the NPPF refers to *'Conserving and enhancing the natural environment'* and paragraph 174 states that decisions should contribute to and enhance the natural and local environment.

<u>Regional Policy</u>

Chapter 2 of the London Plan gives a strategic framework for those parts of London that will see significant development over the lifetime of the Plan. The areas that will see the most significant change are identified as Opportunity Areas. Many of these Opportunity Areas are already seeing significant development, and they all have the potential to deliver a substantial amount of the new homes and jobs that London needs. The London Plan has a clear focus on delivery – something that will require all stakeholders to work together to unlock sites and drive the right sort of development. Infrastructure is key to this delivery and will require major investment in transport, with Opportunity Areas clustered into growth corridors; and proper planning of utilities and

communications capacity and the social infrastructure that supports the day-to-day lives of Londoners, well in advance of new development. Opportunity Area Planning Frameworks and Local Plans should have clear strategies for their delivery.

Policy SD1 *'Opportunity Areas'* of the London Plan states that to ensure Opportunity Areas fully realise their growth and regeneration potential, Boroughs, through Development Plans and decisions, should:

1) Clearly set out how they will encourage and deliver the growth potential of Opportunity Areas
2) Support development which creates employment opportunities and housing choice for Londoners.
3) Plan for and provide the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities, working with infrastructure providers where necessary
4) Recognise the role of heritage in place-making
5) Establish the capacity for growth in Opportunity Areas, taking account of the indicative capacity for homes and jobs in Table 2.1
6) Support and sustain Strategic Industrial Locations (SIL) and other industrial capacity by considering opportunities to intensify and make more efficient use of land in SIL, in accordance with Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution, co-location and substitution
7) Include ambitious transport node share targets
8) Support wider regeneration and ensure that development proposals integrate into the surrounding areas, in accordance with Policy SD10 Strategic and local regeneration
9) Ensure planning frameworks are informed by public and stakeholder engagement and collaboration at an early stage and throughout their development
10) Work with the Mayor, local communities and other stakeholders to review appropriate locations and identify new Opportunity Areas. These should be distinct and significant locations that have capacity for at least 5,000 new jobs and/or 2,500 new homes
11) Take appropriate measures to deal with contamination that may exist

The Heathrow Opportunity Area forms part of the Elizabeth Line West area which is identified to deliver 11,000 jobs. The area contains a range of opportunities to support London's economic development and deliver new jobs and environmental improvements.

Chapter 3 Design of the London Plan contains the following relevant policies:

Policy D1 London's form, character and capacity for growth
Policy D3 Optimising site capacity through the design-led approach
Policy D4 Delivering good design
Policy D5 Inclusive design
Policy D8 Public realm
Policy D11 Safety, security and resilience to emergency
Policy D12 Fire safety
Policy D13 Agent of Change
Policy D14 Noise

Policy D3 *'Optimising site capacity through the design led approach'* 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, including site allocations. 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, and that best delivers the requirements set out in Part D.

Higher density developments should generally be promoted in locations that area well connected to jobs, services, infrastructure and amenities by public transport, walking, and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of higher density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.

Chapter 6 Economy of the London Plan contains the following relevant policy:

Policy E10 *'Visitor Infrastructure'* of the London Plan states:

> a) a sufficient supply and range of serviced accommodation should be maintained.
> h) to ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide:
> 1) 10 percent of new bedrooms to be wheelchair accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Code of practice; or
> 2) 15 percent 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

Chapter 8 Green Infrastructure and Natural Environment of the London Plan contains the following relevant policies:

Policy G4 Open space
Policy G5 Urban greening
Policy G7 Trees and woodland

Chapter 9 Sustainable Infrastructure of the London Plan contains the following relevant policies:

Policy SI 1 Improving air quality
Policy SI 2 Minimising greenhouse gas emissions
Policy SI 4 Managing heat risk
Policy SI 5 Water infrastructure
Policy SI 12 Flood Risk Assessment
Policy SI 13 Sustainable drainage

Chapter 10 Transport of the London Plan contains the following relevant policies:

Policy T1 Strategic approach to transport
Policy T2 Healthy Streets
Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car parking
Policy T6.4 Residential parking

Policy T6.4 *'Hotel and leisure uses parking'* of the London Plan states that in the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.

Accessible London SPG

Local Policies

Hillingdon Local Plan

The Local Plan Part 1 - Strategic policies sets out the overall level and broad locations of growth up to 2026. Together with the Local Plan Part 2 Development Management Policies and Site Allocations and Designation documents it forms the Council's future development strategy for the borough.

The Local Plan Part 1 – Strategic policies contains the following relevant policies:

Policy E3: Strategy for Heathrow Opportunity Area
Policy HE1: Built Environment
Policy EM1: Climate Change Adaptation and Mitigation
Policy EM6: Flood Risk Management
Policy EM7: Biodiversity, and Geological Conservation
Policy EM8: Land, Water, Air and Noise
Policy T1: Accessible Local Destinations
Policy T5: Crossrail
Policy CI1: Community Infrastructure Provision

The Local Plan Part 2 – Development Management Policies contains the following relevant policies:

DME2 Employment Uses Outside of Designated Sites
DME5 Hotel and Visitor Accommodation
DME6 Accessible Hotels and Visitor Accommodation

DMHB11 Design of New Development
DMHB12 Streets and Public Realm
DMHB14 Trees and Landscaping
DMHB15 Planning for Safer Places

DMEI1 Living Walls and Roofs and Onsite Vegetation
DMEI2 Reducing Carbon Emissions
DMEI7 Biodiversity Protection and Enhancement
DMEI9 Management of Flood Risk
DMEI10 Water Management, Efficiency and Quality
DMEI14 Air Quality

DMCI2 New Community Infrastructure

DMT1 Managing Transport Impacts
DMT2 Highways Impacts

DMT5 Pedestrians and Cyclists
DMT6 Vehicle Parking

The proposed development would be assessed against the Development Plan Policies contained within the Adopted Hillingdon Local Plan Parts 1 and 2, the London Plan, the NPPF and supplementary planning guidance of both Hillingdon and the GLA.

Policy E10 (Visitor Infrastructure) of the London Plan provides clear strategic support for the provision of additional visitor accommodation outside the Central Activities Zone when there is good public transport access to central London and international and national transport termini. The Policy encourages the provision of circa 2,230 net additional hotel rooms per annum. The proposal, being in a PTAL 4 *'good'* zone, comprising a hotel and being located in close proximity to international and national transport hubs, accords with the thrust of Policy E10 direction.

The principle of optimising the use of this site for the provision of C1 usage is supported in strategic terms by policy E10 of the London Plan and Paragraphs 81 and 83 of the NPPF which support the growth of economic conditions that deliver more jobs. Policy SD1 *'Opportunity Areas'* of the London Plan states that to ensure Opportunity Areas fully realise their growth and regeneration potential, Boroughs, through Development Plans and decisions, should support development which creates employment opportunities and housing choice for Londoners. The Heathrow Opportunity Area forms part of the Elizabeth Line West area which is identified to deliver 11,000 jobs. This proposal would provide significant contribution towards jobs growth whilst providing ancillary facilities that would aid the growth of local businesses.

Policy DME 5: Hotels and Visitor Accommodation

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.

As stated above, Policy DME 5 of the Local Plan: Part 2 also supports the principle of additional visitor accommodation.

Principle of Development
Full planning application ref: 43794/APP/2018/2779 was recently granted on the 3rd April 2020. This consent and an earlier consent establishes the principle of a C1 usage on the site. As highlighted in the planning policy section above, policy E10 (Visitor Infrastructure) of the London Plan provides clear strategic support for the provision of additional visitor accommodation outside the Central Activities Zone when there is good public transport access to central London and international and national transport termini. The Policy encourages the provision of circa 2,230 net additional hotel rooms per annum.

The proposal, being in a PTAL 4 *'good'* zone, comprising a hotel and being located in close proximity to international and national transport hubs, accords with the thrust of Policy E10 direction.

The principle of optimising the use of this site for the provision of C1 usage is supported in strategic terms by policy E10 of the London Plan and Paragraphs 81 and 83 of the NPPF which support the growth of economic conditions that deliver more jobs. Policy SD1 *'Opportunity Areas'* identifies this area to deliver 11,000 jobs. This proposal would provide a significant contribution towards jobs growth whilst providing ancillary facilities that would aid the growth of local businesses and enhance visitor infrastructure to support tourism more widely within London and the UK.

On this basis and given the limited changes beyond that consented, a proposal that seeks to further optimise the capacity of the site to accommodate hotel accommodation is both appropriate and justifiable.

Density of the proposed development

Whilst Policy D9 of the London Plan seeks to ensure that site capacity is optimised, as the proposal is not for residential, density is not pertinent to the consideration of this application. However, the proposal seeks to optimise the site capacity which should be supported.

Impact on the Character and Appearance of the Area

The site is not located within or adjacent to any designated areas of particularly sensitivity – i.e. heritage assets, which would require a further detailed approach be taken to ensure the design sat comfortably alongside adjacent assets. Furthermore, there are no locally or nationally listed structures within close proximity to the site.

Nevertheless, the newly published NPPF places great importance on development being of good design, responding to local character and reflecting local surroundings and materials. Development is also required to integrate into existing environments and achieve a good standard of amenity for existing/future occupants of land and buildings. Policy D4 *'Delivering good design'* of the London Plan further emphasises the need for good design.

Policy BE1 of the Local Plan requires new development improve and maintain the quality of the built environment in order it create successful sustainable neighbourhoods.

The main changes in this application compared to the previous consent are limited with the principal differences being:

- Removal of excessive basement car park
- Provision of car parking at undercroft level
- Provision of an additional coach parking space and improved coach layby
- Additional storey in height

The removal of the basement car park would improve the hydrology and sustainability of the development, but it would not affect the visual amenity of the area. Similarly, with the provision of car parking within an enclosed undercroft would have limited impact on the streetscene.

In terms of the additional coach parking space and improved coach layby, these changes are not appreciably different to what was previously approved

and will not have a material impact on the character and appearance of the stress.

The main change from the previous scheme that would affect the appearance of the building is the proposed additional storey, resulting in a 7 storey building. It worth highlighting that despite the increase in height, many of the design aspects of the consented scheme have been carried forward such as the proposal having an almost identical footprint, width, depth and material finish. Therefore, aesthetically, the new scheme would not appear much different than the extant scheme except for an additional storey.

Whilst higher than consented, the additional massing would be slight in contrast to the scale of the overall extant building. The additional storey would extend the building very marginally than the consented scheme which would be de minimis when viewed from the surrounding area. The fenestration would make use of sympathetic materials appropriate to Bath Road and the wider surrounding environment. Furthermore, the fenestration changes would result in an improved more coherent design which would ensure a positive relationship with adjacent land uses and buildings. The additional floor and the storey below (top 2 storeys) would be finished with a more contemporary modern glazed appearance that would aid in breaking the building up in mass and height terms.

In the context of Bath Road the hotel would be of a more modest scale than many other hotel developments along the same frontage – indeed it would be amongst the smallest and more modestly sized hotels even with the additional storey. The building is contended to remain of an acceptable height and scale commensurate with the scale of the site and surroundings buildings.

The surface level treatments, landscaping, vehicular arrangements and associated hotel paraphernalia (bin store etc) would result in an improved streetscape compared to the bland open car-park presently in situ.

The additional storey would be set in from the principal vertical alignment. This alongside the different palette of materials would ensure that the upper storeys would appear subservient to the lower 5 storeys. This approach also assists in reducing the scale of the development.

Unquestionably the 'feel' of the immediate Bath Road street scene on the approach from the east and west is one informed by large to very large buildings all clearly exhibiting commercial and functional forms. Massing, width, heights and materials all vary considerably - the proposal would assimilate with the thrust of this pattern of built development.

Given the above, the development is considered to comply with those policies concerned with upholding the character and appearance of the local area.

See accompanying Design and Access Statement prepared by ICA Architecture for further consideration of the acceptability of the design and height of the revised development.

Impact on neighbours

The hotel would be set approximately 30m from the rear windows of properties in Doghurst Avenue which are found to the north beyond landscaping and their rear gardens. The building would be positioned no closer to these neighbouring properties than the extant scheme.

Whilst adhering to separation standards, mindful of the potential for the additional storey to increase the perception of being overlooked, the design was adjusted to ensure the top storey is set further back from these neighbours. This will mitigate against perceived overlooking from the nearest windows to Doghurst Avenue properties from the additional storey.

In terms of the impact the additional storey would have on the amenities enjoyed by neighbours both to the rear and east – in considering matters of outlook, sunlight/daylight etcetera, as the accompanying Design and Access Statement demonstrates the additional storey would not in practice lead to a significantly higher building than consented and would not therefore lead to a demonstrable reduction in amenity or indeed exposure to sunlight/daylight. In light of this alongside the fundamentally identical siting, existing landscaping to the north of Egerton Way and separation distance in excess of Policy requirements to the Doghurst Avenue properties beyond, it is opined that the enlarged hotel would not result in an unacceptable visual impact or dominant feature.

The hotel will have east facing windows facing towards Axis House. However, Axis House does not have windows facing directly towards the hotel only north towards Egerton Way – accordingly whilst there would be some overlooking into habitable rooms at Axis House this would be very much at an oblique angle.

The additional storey would not in practice demonstrably increase the height of the building above that consented – witness the overlay comparison drawings accompanying this submission. Accordingly, it is opined that when contrasted to the fall-back position the changes inherent in this proposal would not demonstrably alter the amenity enjoyed by the residents of Doghurst Avenue to a degree to warrant a conclusion other than that the proposal would the redevelopment of the site would continue to be acceptable.

The revised fenestration details and materials palette are also considered an improvement over that recently consented. Certainly, the resultant aesthetic appearance of the enlarged hotel will be equally appropriate to the street scene and area generally as the extant consent and can therefore be supported.

Amenity for future users of the development

There is no adopted planning standards in respect of privacy/overlooking between hotel guest bedrooms. Nevertheless, the development would provide good quality serviced accommodation for future users.

Traffic impact, car/cycle parking, pedestrian safety

DMT1 Managing Transport Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.

DMT2 Highways Impacts of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals must ensure that safe and efficient access to the highway network is provided; the proposal does not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents; safe and convenient facilities for pedestrians and cyclists are provided; impact on local amenity and congestions are minimised by routing through traffic by the most direct means; there is suitable mitigation measures to address any traffic impacts.

DMT5 Pedestrians and Cyclists of Hillingdon's Local Plan: Part 2 – Development Management Policies states that development proposals will be required to provide safe, direct and inclusive access for pedestrians and cyclists and for development along the Blue Ribbon Network it is required that they enhance and facilitate inclusive, safe and secure pedestrian and cycle access to the network.

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.

In terms of access, traffic and general layout, the development is not appreciably different than the extant scheme so the proposal should be acceptable in this regard.

Policy T6.4 *'Hotel and leisure uses parking'* of the London Plan states that in the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.

DMT 6 *'Vehicle Parking'* of the Local Plan sets out the local standards for car parking. It states that for every 10 members of staff, 1 parking space should be provided. Also, a taxi pick up and set down, and 1 coach space per 50 rooms will be required.

The size of the proposed hotel in comparison with the extant consent is the same. Therefore, the proposal will have no greater need for parking than the previous scheme. This new proposal will provide an additional coach parking space which would make the development more sustainable and acceptable from a transport perspective. The proposal also provides a separate layby for taxi pick up and drop off.

In terms of car parking more generally, the site is in PTAL 4 and the proposed hotel would have up to 40 staff. Therefore, the development should provide a minimum of 4 parking spaces. The proposal provides 23 car parking space of which 6 would be accessible bays. Given the size of the hotel, this level of car parking would comply with adopted policy at local and regional level. The development also provides cycle parking commensurate to the scale of the hotel.

An updated Transport Statement accompanies this application. This builds on the findings of the Transport Statement which accompanied the recently consented 157 bed scheme analysing and appraising the different quantum of transport considerations inherent in the proposal against the backdrop of the findings of the Statement previously found acceptable under the extant consent.

It is worth noting that previous applications sought to provide some additional parking for residents at Axis House. For clarity and as a starting point, it needs to be understood that the application site is not used by these residents and they have no right to parking on it.

Nevertheless, this neighbouring development has 28 car parking spaces for their use on their own site. This site is also in PTAL 4 where the London Plan states that between 0.5-0.75 spaces per dwelling should be provided. Given the number of residential properties within this building, it would be served by a proportion of parking spaces commensurate with adopted policy.

The Site has a PTAL rating of 4 (good). Given this and the site's location generally to many sustainable modes of travel, with a particularly large number of bus services connecting the site to the local and wider area and principal transport hubs, the proposal is not considered to raise any issues beyond those associated with the extant consent.

In terms of refuse collection, the site will now be accessed from Egerton Way. The refuse collection arrangements were found acceptable under the extant consent. The changes in the scheme would have no demonstrable implications for service provision.

See accompanying Transport Assessment for more details, however the parking and transport arrangements are considered to be an improvements on the previous scheme.

Accessibility

Policy E10 'Visitor Infrastructure' of the London Plan states:

1) 10 percent of new bedrooms to be wheelchair accessible in accordance with Figure 52 incorporating either Figure 30 or 33 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Code of practice; or
2) 15 percent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard

The proposed hotel will provide 16 accessible rooms (10.19%) in accordance with BS8300-2:2018 and policy E10 of the London Plan. The development will also provide 6 accessible parking spaces which is considered a proportionate level of disabled parking for its size and sustainable location in a Public Transport Accessibility level of 4.

The design carries forward the accessibility compliance credentials inherent in the extant consent. These include meeting the minimum provision of accessible bedrooms as a percentage of the overall total of bedrooms which as with the extant consent could be secured via condition.

Airport Safeguarding Report

A multitude of obstacles both inside and outside of Heathrow airport's boundary can affect plane operations. The proposed development is located within the London Heathrow Airport (LHR) Safeguarding Area. This statement considers airport safeguarding and specifically considers the proposal against the following elements of operations take-off, landing, arrival and departure procedures.

The development area is located to the North of LHR and therefore the proposal does not sit underneath the line of approach or take off. Nonetheless, the scheme has been designed with the following considerations.

The scheme has been designed to look unattractive to birds and sits below the height of 25 metres however, as the roof of the scheme is proposed to be greater than 500 square metres and flat, it will be necessary to have continual monitoring of bird activity which will be conducted throughout the year. The monitoring process will include but not be limited to the checking of nesting birds and dispersing of nesting and other non-nesting birds. Dispersal methods include the automatic audio dispersal such as a distress call of which will be carried out during the breeding season of March to June.

The steps taken will see the reduction to the overall risk to aircrafts in the vicinity by reducing the risk of bird strike, overall limited landscaping has been ensured to reduce this risk further. Further details of these measures could be secured by condition by means of a Bird Hazard Management plan.

Flooding or Drainage Issues

The EA Flood Zone map shows that the site is located in Flood Zone 1 which is the lowest risk level of flooding. Nevertheless, a FRA and drainage strategy has been prepared in support of this application.

The accompanying Flood and Drainage Assessments discusses the schemes compliance with relevant Policy stipulations. The changes in the scheme would have no demonstrable implications in terms of dealing with flooding and drainage matters.

Noise and/or Air Quality Issues

The accompanying updated Air Quality Assessment and Noise Assessment consider the implications pursuant to both arising from the additional quantum of development proposed. The reports find the development would comply with applicable regulations and requirements. As with the extant consent conditions are suggested to ensure compliance with stated objectives.

Conclusion

In conclusion, we consider that the changes inherent in the development, principally the additional storey, implications of parking and fenestration changes, raise no new issues not already found acceptable when considering the extant consent.

The accompanying documentation demonstrate that the additional story would only marginally increase the overall height and massing of the building above that consented. This relatively small change in the overall scale of the development would not have a demonstrable impact on the appearance of the wider street scene of (in particular) Bath Road or the residential amenities of occupiers of Axis House or Doghurst Avenue.

The on-site parking provision would continue to be acceptable for purpose, little different to the quantum of parking seen at immediately adjacent hotels. When coupled with the provision of funding towards the Hoppa bus service, accessibility by public transport and the highly likely purpose of the hotel being used in association with the airport, the parking provision is considered to be entirely acceptable rendering the scheme in continued compliance with applicable Development Plan requirements.

The development would have a high-quality design which would add visual interest to the street scene replacing a large gap in the otherwise built up frontage evident presently whilst enhancing the local character.

Changes in articulation and architectural treatment reinforce the contemporary design with a strong horizontal rhythm emphasised by type of cladding, windows and other architectural elements. The development would provide a suitable transition in height and scale from neighbouring buildings/development. It is considered that the resulting building would sit comfortably within the site and would not adversely impact the character and appearance of the area.

The proposal can be appropriately accommodated in this location without appearing overbearing on the surrounding area or unacceptably detracting from the amenities of adjoining occupiers by reason of loss of light, privacy, or outlook.

Subject to a legal agreement, the proposal would not raise any issues relating to highways implications.

It is considered that the revised scheme complies with the Development Plan and is capable of receiving support and consent.