
Status Park, Nobel Drive

Planning Statement

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1. Introduction

1.1. This Town Planning Statement has been prepared on behalf of our client 'MHA Heathrow Ltd' to support a full planning application for a new hotel at Status Park, Nobel Drive.

1.2. The description of development is as follows:

"Redevelopment of the existing car park to provide a 6 storey 140 room hotel, together with associated landscaping and car parking".

Accompanying Reports

1.3. This statement describes the development proposals against the relevant planning policy framework. It should be read in conjunction with the accompanying application drawings and a number of specialist reports which have been prepared to support the application. These reports include the following:

- Air Quality Assessment prepared by Air Quality Assessments Ltd;
- Design and Access Statement prepared by Collado Collins Architects;
- Daylight and Sunlight Assessment prepared by T16 Design;
- Drainage Statement prepared by Peter Brett Associates LLP;
- Energy Statement prepared by T16 Design;
- Sustainability Statement prepared by T16 Design;
- Environmental Noise Survey and Acoustic Design Statement prepared by Hann Tucker Associates;
- Phase 1: Preliminary Risk Assessment prepared by Phlorum;
- Structural Summary prepared by Scott White and Hookins;
- Transport Assessment prepared by Royal Haskoning DHV;
- Travel Plan prepared by Royal Haskoning DHV;
- Arboricultural Report prepared by Crown Consultants;
- Tree Schedule prepared by Crown Consultants; and
- Landscape Report prepared by BD Landscape Architects.

1.4. This report includes the following sections:

- Chapter 1 – Introduction;
- Chapter 2 – Background;
- Chapter 3 – Planning History;
- Chapter 4 – The Proposal;
- Chapter 5 – Planning Policy context;
- Chapter 6 – Planning Assessment; and
- Chapter 7 – Conclusion

2. Background

- 2.1. The site is situated to the north east of Heathrow Airport on the northern side of the Bath Road (A4) and is accessed via Nobel Drive. Heathrow Airport is located approximately 0.25 miles to the south. The surrounding area is characterised by a large number of modern commercial, office and hotel buildings, together with some residential and retail premises and a number of cleared development sites.
- 2.2. Other hotels located along Bath Road include the IBIS Hotel which is immediately to the west and Premier Inn which is approximately 240m to the east. To the north of the site there is an G4S facility with an area of green belt land to the east. Building heights and sizes vary from 2 to 6 storeys, with the larger hotel and office developments facing Bath Road, and extending back to Nobel Drive.
- 2.3. The site comprises an existing office building named Building 2, Status Park and adjacent existing car park. The hotel building is proposed to the east of the existing office building on the existing car park. The existing car park has approximately 85 car parking spaces including 3 disabled spaces.
- 2.4. As identified on the Councils 2015 Policy map the site is designated as a Hotel and Office Growth Location and within Annex One of the 2016 Local Plan the site is situated within the boundaries of the emerging 'Heathrow Opportunity Area'.
- 2.5. The site is well connected via bus routes, with a number of bus stops on Bath Road; numerous bus, coach and rails services also serve the nearby Heathrow Airport Terminals 1, 2 and 3 and other airport terminals. The nearest underground and train stations are located at the airport terminals; these are easily accessed by bus from the development site. The airport is served by the Piccadilly Line, the Heathrow Express train service from Paddington and Heathrow Connect service. The site has a Public Transport Accessibility Level (PTAL) of 3.
- 2.6. There are no listed buildings, Scheduled Monuments or World Heritage Sites on or in close proximity to the site.
- 2.7. The Environment Agency flood map confirms that the site is set within flood zone 1 (lowest risk of flooding).

3. Planning History

- 3.1. A desk-top research of the planning history records held by the Council has been undertaken. Key recent applications of relevance to the development proposals are provided below:

Reference	Description	Decision
Building 2, Status Park		
72408/APP/2017/3021	Prior approval for the change of use from Use Class B1 (a) (offices) to Use Class c3 (Residential) to provide 46 self-contained units (6 x studio flats, 38 x 1 bed flats and 2 x 2 bed flats) with provision of ca parking, cycle and refuse storage.	Approved August 2017
72408/APP/2016/4382	Prior approval for the change of use from Use Class B1 (a) (offices) to Use Class C3 (Residential) to provide 42 self-contained units (32x1 bed and 10 x 2 bed) with provision of cycle and effuse storage.	Approved January 2017

Pre-application Advice

- 3.2. Formal Pre-application consultation has been undertaken with Hillingdon Borough Council including a meeting on the 30th August 2018. The scheme initial presented to the Council was for a 157 room hotel over 6 storeys.
- 3.3. The summary of comments received is as follows:
- The proposal for a hotel in this location is consistent with the allocation within the Policies Map (October 2015) as a 'Hotel and Office Growth Location' and is considered acceptable in principle.
 - Concern over the footprint of the pre-application proposal extending into previously landscaped areas and not following the existing building line along Bath Road.
 - Lack of servicing details provided in initial plans.
 - To provide consideration of the impacts on neighbouring amenity with a forthcoming application.
 - For a detailed Transport Statement to support a forthcoming application and that each unit within Building 2 to be allocated a car parking space.
- 3.4. In addition to the above pre application advice was received on 20th September 2018 from Heathrow Airport Operational Facility. A summary of their comments is provided below:

- Based on the location of the site beneath the Transitional Surface for Runway 09L/27R heights of buildings, plant, and roof structures are restricted to a maximum height of 51m AOD;
- For proposed external lighting to be designed to avoid confusion with aeronautical ground lights and to prevent glare to landing aircraft; and
- The importance for buildings and landscaping to be designed so that they are unattractive to birds.

3.5. Following obtaining pre-application advice the proposed scheme has been amended having taken into account the advice received.

4. The Proposal

- 4.1. The development proposals seek to provide a 140 bed hotel within the existing car park to Building 2, Status Park. The development proposals propose associated coach parking, car parking, service bay and comprehensive landscaping.
- 4.2. It is proposed for the exiting office building (Building 2) to be retained and for the planning application for the change of use of the property to residential (application ref: 72408/APP/2017/3021) to be implemented.
- 4.3. The proposed hotel will comprise of approximately 4,870sqm (GIA) over 6 storeys comprising 140 rooms including ground floor communal areas, reception, restaurant and back of house facilities. The layout will have a clear separation of function zones, with the main entrance leading to the reception/lobby area and then into the bar / café area.

Access

- 4.4. The site will be accessed from Nobel Drive. It is proposed to the existing entrance into the car park to be revised and relocated to the west. The new access will serve the 28 car parking spaces on site including 3 disabled parking spaces. Motorcycle parking spaces, short stay cycle spaces and a taxi pick up / drop off space will also be accessed from this new access.
- 4.5. Coach Parking and a loading bay / temporary coach parking bay leading directly onto Nobel Drive is located to the north of the site.
- 4.6. The development utilises existing pedestrian and cyclist access within the sites vicinity. New connections are provided onto this existing infrastructure through a footpath to the east and to the north west of the site.

Parking

- 4.7. The proposed development will provide 28 car parking spaces, including 3 disabled spaces.
- 4.8. In addition, a total of 6 short stay cycle parking spaces will be provided within the landscaped area in the hotel forecourt and a further 7 cycle parking spaces within the proposed hotel building.
- 4.9. Motorcycling parking is also proposed adjacent to the westerly elevation of the proposed hotel building.

Layout

- 4.10. The proposals maintain the existing building line and landscape buffer along Bath Road. An L shape building is proposed fronting onto Bath Road and Nobel Drive. A separation distance of circa 16m is proposed between the west façade of the proposed building and the front of Building 2.

Materials

- 4.11. The proposed materials respond to the existing material palette present in the surrounding area. The proposed building has been designed to respond to the surrounding context. The choice of materials and fenestration will help to break up the mass of the built form and to emphasise the prominent corner on Bath Road.

Landscaping

- 4.12. A central entrance court will be provided to create a pleasant environment for both the future residents of 2 Status Court as well as hotel guests.
- 4.13. The choice of planting will take into consideration Heathrow Airport Operational Facility advice, avoiding berry carrying plants which may attract birds.

5. Planning Policy Context

5.1. This section of the statement provides a brief summary of the relevant planning policy framework.

5.2. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004:

“When making any determination under the planning acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise”.

5.3. For the purpose of section 38(6) of the Planning and Compulsory Purchase Act, the Development Plan for the site comprises the following:

- The Hillingdon Local Plan: Part 1 – Strategic Policies and;
- The extant 2007 Saved Unitary Development Plan policies adopted as the Hillingdon Local Plan: Part 2; and
- The London Plan (Consolidated with Alteration since 2011, adopted March 2016).

5.4. Material Considerations include; the National Planning Policy Framework (NPPF); Planning Practice Guidance (PPG); regional and supplementary planning guidance/documents (SPG/SPDs); and emerging planning policy documents.

NATIONAL PLANNING POLICY AND GUIDANCE

National Planning Policy Framework (NPPF)

5.5. A revised National Planning Policy Framework (NPPF) was published by the UK Government’s Ministry of Housing, Communities and Local Government on 24 July 2018. This is the first revision of the National Planning Policy Framework since 2012. The NPPF provides an overarching framework for the production of local policy documents and planning decisions.

5.6. At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11). Sustainable development is defined as having three overarching objectives: economic, social and environmental.

5.7. Details of these objectives are provided at Paragraph 8, stated below:

“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment; with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

An environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

5.8. As detailed at Paragraph 10 so that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

5.9. Chapter 9 provides guidance on locating development in a location that promotes use of sustainable transport infrastructure. Paragraph 103 states:

"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".

5.10. Chapter 11 outlines the Government's stance on making effective use of land. Key aspects of Paragraph 118 which are of relevance to the development proposals are provided below:

- a) *"give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;*
- b) *Promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example, converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure); and*
- c) *Support opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extension where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed (including complying with any local design policies and standards), and can maintain safe access and egress for occupiers".*

5.11. Paragraph 80 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.

- 5.12. Paragraph 118 of the NPPF states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land. Paragraph 118 further states that planning policies and decisions should, promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock ups and railway infrastructure).
- 5.13. Paragraph 124 states that the creation of high quality 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.

REGIONAL PLANNING POLICY

The London Plan (2016)

- 5.14. The London Plan sets the over strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20 – 25 years. The key policies of relevance to the development proposals are provided below.

Policy 4.5 London's Visitor Infrastructure

- 5.15. Policy 4.5 outlines how the Mayor will, and boroughs and relevant stakeholders should:
- A. *"Support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London.*
 - B. *Seek to achieve 40,000 net additional hotel bedrooms by 2036, of which at least 10 per cent should be wheelchair accessible*
- Ensure that new visitor accommodation is in appropriate locations:*
- C. *It may be appropriate to locate visitor accommodation related to major visitor attractions of sub-regional or greater significance in locations other than those set out in this paragraph, but only where it can be shown that no suitable site in one of these locations exists and that there is a clear link in scale, nature and location (particularly demonstrating sufficient proximity to minimise the overall need to travel and maximise walking and cycling) between the accommodation and the attraction being served.*

- D. Support provision for business visitors, including high quality, large scale convention facilities in or around the CAZ.*
- E. Recognise the need for apart hotels in the context of the broader policies of this Plan.*
- F. Promote, enhance and protect the special characteristics of major clusters of visitor attractions.”*

Policy 6.3 (Assessing effects of development on transport capacity)

- 5.16. Outlines the requirement for development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

LOCAL PLANNING POLICY

Local Plan Part 1 – Strategic Policies

- 5.17. The Local Plan: Part 1 – Strategic Policies is the key strategic planning document for Hillingdon. It sets out the long term vision and objectives for the Borough, what is going happen, where, and how this will be achieved. The key policies of relevance to the development proposals are provided below.

Policy BE1: Built Environment

- 5.18. 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. To meet this all new developments should:
- 1. “Achieve a high quality of design in all new buildings, alterations, extensions and the public realm which enhances the local distinctiveness of the area, contributes to community cohesion and a sense of place;*
 - 2. Be designed to be appropriate to the identity and context of Hillingdon's buildings, townscapes, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings, particularly residential properties;*
 - 3. Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;*
 - 4. Improve the quality of the public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect the local character and landscape, integrate with the development, enhance and protect biodiversity through the inclusion of living walls, roofs and areas for wildlife, encourage physical activity and where appropriate introduce public art;*

5. *Create safe and secure environments that reduce crime and fear of crime, anti-social behaviour and risks from fire and arson having regard to Secure by Design standards and address resilience to terrorism in major development proposals;*
6. *Not result in the inappropriate development of gardens and green spaces that erode the character and biodiversity of suburban areas and increase the risk of flooding through the loss of permeable areas;*
7. *Maximise the opportunities for all new homes to contribute to tackling and adapting to climate change and reducing emissions of local air quality pollutants. The Council will require all new development to achieve reductions in carbon dioxide emission in line with the London Plan targets through energy efficient design and effective use of low and zero carbon technologies. Where the required reduction from on-site renewable energy is not feasible within major developments, contributions off-site will be sought. The Council will seek to merge a suite of sustainable design goals, such as the use of SUDS, water efficiency, lifetime homes, and energy efficiency into a requirement measured against the Code for Sustainable Homes and BREEAM. These will be set out within the Hillingdon Local Plan: Part 2- Development Management Policies Local Development Document (LDD). All developments should be designed to make the most efficient use of natural resources whilst safeguarding historic assets, their settings and local amenity and include sustainable design and construction techniques to increase the re-use and recycling of construction, demolition and excavation waste and reduce the amount disposed to landfill;*
8. *In the case of tall buildings, not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape."*

Policy E2: Location of Employment Growth

- 5.19. Policy E2 states that the Council will accommodate 9,000 new jobs during the plan period. It is identified that most of this employment growth will be directed toward suitable sites in the Heathrow Opportunity Area. The Council note that they will promote development in highly accessible locations that delivers sustainable travel patterns and contributes to the improvement of existing networks to reduce emissions and impacts on air quality. In addition to this the Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

Policy E3: Strategy for Heathrow Opportunity Area

- 5.20. Policy E3 identify that "the Council will prepare a Local Development Document (LDD) for the Heathrow

area to achieve the future growth set out in Table 5.3, in consultation with the GLA and London Borough of Hounslow. This LDD will help manage development and protect land within the Heathrow Airport boundaries for airport-related activities. It will seek to ensure that local people benefit from sustainable economic growth located both within the Airport boundaries and in the Perimeter areas. The LDD will also set requirements for climate change mitigation and adaptation through a low carbon emission strategy and measures to improve local air quality”.

Policy EM1: Climate Change Adaptation and Mitigation

- 5.21. Policy EM1 identify that the Council will ensure that climate change mitigation is addressed at every stage of the development process by:
1. *“Promoting a modal shift away from private car use and requiring new development to include innovative initiatives to reduce car dependency.*
 2. *Ensuring development meets the highest possible design standards whilst still retaining competitiveness within the market.*
 3. *Working with developers of major schemes to identify the opportunities to help provide efficiency initiatives that can benefit the existing building stock.*
 4. *Promoting the use of decentralised energy within large scale development whilst improving local air quality levels.*
 5. *Targeting areas with high carbon emissions for additional reductions through low carbon strategies. These strategies will also have an objective to minimise other pollutants that impact on local air quality. Targeting areas of poor air quality for additional emissions reductions.*
 6. *Encouraging sustainable techniques to land remediation to reduce the need to transport waste to landfill. In particular developers should consider bioremediation(39) as part of their proposals.*
 7. *Encouraging the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan. Identify opportunities for new sources of electricity generation including anaerobic digestion, hydroelectricity and a greater use of waste as a resource.*
 8. *Promoting new development to contribute to the upgrading of existing housing stock where appropriate.”*

Policy EM6 (Flood Risk Management)

- 5.22. Policy EM6 outlines how the Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.

Policy EM8 (Land, Water, Air and Noise)

- 5.23. The requirements of policy EM8 of relevance to the development proposals are provided below.

Water Quality

"The Council will seek to safeguard and improve all water quality, both ground and surface."

Air Quality

"All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors."

All major development within the Air Quality Management Area (AQMA) should demonstrate air quality neutrality (no worsening of impacts) where appropriate; actively contribute to the promotion of sustainable transport measures such as vehicle charging points and the increased provision for vehicles with cleaner transport fuels; deliver increased planting through soft landscaping and living walls and roofs; and provide a management plan for ensuring air quality impacts can be kept to a minimum."

Noise

"The Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated."

Land Contamination

"The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses. Major development proposals will be expected to demonstrate a sustainable approach to remediation that includes techniques to reduce the need to landfill."

Water Resources

"The Council will require that all new development demonstrates the incorporation of water efficiency measures within new development to reduce the rising demand on potable water. All new development must incorporate water recycling and collection facilities unless it can be demonstrated it is not appropriate. For residential developments, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day."

Policy EM11: Sustainable Waste Management

- 5.24. Policy EM11 outlines that *"The Council will require all new development to address waste management at all stages of a development's life from design and construction through to the end use and activity on site, ensuring that all waste is managed towards the upper end of the waste hierarchy"*.

Policy T4: Heathrow Airport

- 5.25. Policy T4 details the importance of recognising the economic importance of the airport to the borough and how policies within the Local Plan will support the sustainable operation of Heathrow within the rest of its present boundaries and growth in the Heathrow Opportunity Area by facilitating improvements to public transport and cycle links, enhancing the public transport interchange to provide the opportunity for a modal shift from the use of private cars and from short haul air to sustainable transport modes and providing transport infrastructure to accommodate economic and housing growth whilst improving environmental conditions, for example noise and local air quality for local communities.

Unitary Development Plan – Saved Policies

- 5.26. The UDP was Hillingdon's long term development strategy. Since its adoption, in 1998, the strategic policies have been replaced by the Local Plan Part 1 – strategic policies 2012. The remaining UDP policies of relevance to the development proposals that have been saved are provide below.

Policy AM2

- 5.27. *"All proposals for development will be assessed against:*
- i) Their contribution to traffic generation and their impact on congestion, particularly on the principal road network as defined in paragraph 14.14 of the plan, and*
 - ii) The present and potential availability of public transport, and its capacity to meet increased demand.*

Policy AM7

- 5.28. *"The local planning authority will consider whether the traffic generated by proposed developments is acceptable in terms of the capacity and functions of existing and committed principal roads only, and will wholly discount any potential which local distributor and access roads may have for carrying through traffic.*
- 5.29. *The local planning authority will not grant permission for developments whose traffic generation is likely to:*
- i) Unacceptably increase demand along roads or through junctions which are already used to capacity, especially where such roads or junctions form part of the strategic London road network; or*
 - ii) Prejudice the free flow of traffic or conditions of general highway or pedestrian safety; or*
 - iii) Diminish materially the environmental benefits brought about by new or improved roads; or*
 - iv) Infiltrate streets classed as local roads in the borough road hierarchy unless satisfactory traffic calming measures can be installed.*

- 5.30. *Traffic calming schemes should, where appropriate, include environmental improvement such as hard and soft landscaping, and should be completed before the development is first used or occupied.*

Policy AM8

- 5.31. The Council will accord priority to the needs and comfort of pedestrians in the design and implementation of road construction and traffic management schemes except where safety considerations dictate otherwise. In particular it will seek to minimise the diversion of pedestrian routes from pedestrian desire lines and the delays experienced by pedestrians at signal controlled road crossings.

Policy AM13

- 5.32. *"The Local Planning Authority will seek to ensure that proposal for development increase ease and spontaneity of movement for elderly people, the frail and people with disabilities by including where appropriate:*

- i) Improved Dial-A-Ride and mobility bus services together with suitable means for people with disabilities and people dependent on wheelchairs for mobility to use public transport;*
- ii) Shopmobility schemes;*
- iii) adequate and convenient parking spaces for people with disabilities, especially around shopping areas and entertainment and recreation facilities;*
- iv) Measures to incorporate the needs for people with disabilities into road, footway, parking and pedestrianisation schemes; including benches, public lavatories, footpath surfaces, dropped kerbs and texture crossings, with proper regard to the siting and visibility of street furniture.*

Policy BE13

- 5.33. Policy BE13 states that development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance.

Policy BE20

- 5.34. Policy BE20 states that buildings should be laid out so that adequate daylight and sunlight can penetrate into and between them and the amenities of existing houses are safeguarded.

Policy BE21

- 5.35. Policy BE21 states that planning permission will not be granted for new buildings or extensions which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.

Policy BE24

- 5.36. Policy BE24 outlines how the design of new buildings should protect the privacy of the occupiers and their neighbours.

Policy BE35

- 5.37. Policy BE35 details how when considering proposals for major development adjacent to and visible from major road and rail connections to Heathrow and Central London to ensure that: the development is of a high standards of design, layout and landscape; that where opportunities arise, attractive views and important local landmarks are opened up from these transport corridors.

Policy BE38

- 5.38. Policy BE38 states that development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting and landscaping wherever it is appropriate. It also states that planning applicants for planning consent will be required to provide an accurate tree survey showing the location, height, spread and species of all trees where their proposals would affect any existing trees.

Policy OE8

- 5.39. Policy OE8 states that planning permission will not be granted for new development or redevelopment of existing urban areas which would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the Council, in consultation with the Environment Agency and, where appropriate, other drainage bodies.

Policy T2

- 5.40. Policy T2 identifies that the Local Planning Authority will encourage the provision of a range of accommodation and conference facilities on sites easily accessible from Heathrow Airport, underground and railway stations and from the main road network provided the development does not conflict with the aim to maintain and improve the environment.

Policy T4

- 5.41. Policy T4 identifies that 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 British 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”.*

5.42. Policy AM2 outlines how all proposals for development will be assessed against their contribution to traffic generation and their impact on congestion, particularly on the principal road network and the present and potential availability of public transport, and its capacity to meet increased demand.

Supplementary Planning documents and guidance

5.43. A series of supplementary planning guidance (SPG) and supplementary planning documents (SPD) has been produced by the Council to provide greater detail on strategic policies to support decisions on planning applications.

5.44. The following documents have been taken into account:

- Accessible Hillingdon SPD – September 2017;
- Noise SPD adopted 24 May 2006;
- Air Quality SPG; and
- Land Contamination SPG adopted January 2014.

6. Planning Considerations

6.1. This section of the Planning Statement assesses the application proposal against the planning policy framework for the site. Consideration is given to the principle of the proposed development and other planning issues arising from the development proposal including:

- Principle of Development;
- Design;
- Landscaping
- Amenity;
- Transport;
- Noise
- Sustainability and Energy;
- Transport; and
- Planning Obligations.

Principle of Redevelopment

- 6.2. The principle of redevelopment is accepted based on the proposals utilising a brownfield / previously developed site, as encouraged in Paragraph 118 of the NPPF. The site is situated in a suitable location due to the sites location in close proximity to a range of public transport infrastructure as demonstrated through the PTAL of 3. Development in such locations are promoted at national level in the NPPF and locally in Hillingdon's UDP.
- 6.3. UDP Policy T4 states that *'hotels, guest houses and other tourist accommodation will be acceptable in principle'*. In addition to this the site is identified as a 'Hotel and Office Growth Location' on the Council's Proposals Map (October, 2015). Policy E2 of the Council's Local Plan Part 1 also states that land outside of designated employment land on the Heathrow perimeter, such as the proposal site, is a key location for accommodating additional hotel bedrooms. On this basis the principle of the proposals is considered to be acceptable.
- 6.4. As stated within the London Borough of Hillingdon's Local Plan Part 1 and Policy 4.5 of the London Plan (2016) there is a London wide target for 40,000 additional hotel bedrooms within London by 2036. As part of this requirement, the GLA allocate a requirement of 3,800 hotel bedrooms to the London Borough of Hillingdon. Within the Local Plan it suggests that this figure is underestimated and that there is a need for 5,600 rooms by 2026. It is assumed that this is based on long term growth predictions for the airport. The proposed hotel which will provide 140 hotel rooms will therefore make a valuable contribution towards the identified needs in the borough. Likewise, Policy T2 of the Hillingdon Local Plan: Part Two Saved UDP Policies (November 2012) encourages the provision of a range of accommodation on sites easily accessible from Heathrow airport, provided the development does not conflict with the aim to maintain and improve the environment. The provision of a hotel on site will seek to work alongside Heathrow Airport and

ensure the development is well integrated with the surrounding area.

- 6.5. Having regards to economic growth and employment improvement, Local Plan policy E2 (Location of Employment Growth) identifies that the Council will accommodate 9,000 new jobs during the Plan period (2012-2026). The emerging Heathrow Opportunity Area, which the application site is situated within, is identified as a key area in providing economic growth and will help in improving access to employment. Having regards to the key principle of promoting economic growth and improving access to employment, the hotel proposals will assist in meeting the employment requirements proposed over the plan period resulting in the potential for greater employment opportunities as encouraged in Paragraph 80 of the NPPF.
- 6.6. Overall the redevelopment of the site provides the opportunity to introduce a new hotel development that reflects the character and land uses of its immediate context while responding to local and national policies. The planning policy framework indicates that the site will be well placed for Heathrow Airport ensuring that a sufficient level of hotel accommodation is available. As such, the above demonstrates how the proposals meet the economic and social dimensions to achieving sustainable development as outlined in Paragraph 7 of the NPPF.

Design

- 6.7. Detailed assessment and consideration of the design is provided within the Design and Access Statement that accompanies this application.
- 6.8. The new building will create a new identity for the site, optimising its potential whilst recognising the constraints posed by its context and its proximity to Heathrow Airport.
- 6.9. Local Planning Policy reinforces the requirement for proposals to achieve a high standard of design and for layouts to respect the local context as well as being compatible with the immediate surroundings. As required under Policy BE35 this is particularly important due to the sites locations along a major road. During pre-application engagement concerns were raised regarding loss of the landscaping buffer along Bath Road and as the existing proposals did not follow the predominate building line along Bath Road. The proposals have been amended to respond to these comments.
- 6.10. Among these and other design amendments the proposals are designed so that they are sympathetic to the design and appearance of their surroundings and so that the site sits comfortably within the street scene on Bath Road. The intended massing will create a strong corner site, emphasising the entrance to the built up area to the south of Harlington which is characterised by hotels, offices and commercial buildings.
- 6.11. The general palette of materials proposed have been carefully selected in order to deliver a high quality scheme. The visual appearance of the elevations are considered appropriate when compared with other buildings in the immediate proximity. Brick will be the principal external material as it is the predominant building material in the immediate proximity of the site, is robust, requires low maintenance and acts as an effective acoustic barrier. In this regard, the proposed use and design conforms with the principle concerns of policies BE1 and BE13.

- 6.12. At 6 storeys in height the proposed hotel building is the same height as a number of buildings within the locality including the IBIS Hotel, approximately 50m to the west of the site. This building acts as a precedent as to what is likely to be considered as acceptable on site. On this basis the proposals are not considered to adversely affect the surrounding local character as required under Policy BE1.
- 6.13. As is identified in Section 3 prior engagement has been undertaken with Heathrow Airport Operational Facility regarding the height of the proposed hotel development. The advice received advised that the maximum height on site should be no more than 51m. The proposal complies with this height restriction, therefore, also complying with the requirements of Local Policy BE13.
- 6.14. For the reasons set out above it is considered that the design relates architecturally to the surrounding area and its height and general elevational proportions are in keeping.

Landscaping

- 6.17. In accordance with local policy, the development proposals have provided a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity in an area deficient in green infrastructure.
- 6.15. Of the 26 trees surveyed on site there are no Category A trees, only two Category B trees and none of the trees have tree preservation orders applied to them. Although some trees are required to be removed as part of a forthcoming application no Category A or Category B trees are to be removed. 12 trees are required to be removed in order to implement the proposals, however, to justify this 39 trees are proposed to be planted representing a net uplift of trees on site. As a result there is no net loss in the quality of the tree setting on site.
- 6.16. As detailed in Section 3, following advice obtained from Heathrow Airport Operational Facility, no fruit yielding trees are proposed so not to encourage birds into the area which may conflict with airport operations.
- 6.17. Policy BE38 seeks the retention of topographical and landscape features of merit and provision of new planting and landscaping. In accordance with Policy BE38 and DMHB 14. The development proposal maximise retention of hard and soft landscaping appropriate to the character of the area.
- 6.18. The landscape scheme provides the scope to enhance the boundary planting to provide better tree cover. This will enhance the visual amenity of the site particularly regarding the poor air quality associated with Bath Road and Heathrow Airport.

Amenity

- 6.19. The perpendicular positioning of the proposed hotel building to the existing office building will reduce overlooking, and maximise levels of daylight / sunlight into both buildings and will assist in providing privacy for adjacent occupiers. Likewise, the proposal will be sympathetic to adjacent businesses in terms of lighting and noise emissions as required under Policy DME5.

- 6.20. In order to assess the impact in terms of loss of daylight / sunlight a Daylight and Sunlight Assessment has been prepared by T16 Design. This report uses industry standard methodology, numerical analyses to ascertain the effects of the development and the levels of change in daylight and sunlight for the neighbouring properties to the proposed hotel.
- 6.21. The main criteria used in this analysis to show compliance are the Annual Probable Sunlight Hours and Vertical Sky component tests. The Daylight / Sunlight report demonstrates that all of the notional windows assessed retain a VSC of greater than 27% and so the scheme is compliant with BRE guidance for daylight.
- 6.22. In terms of sunlight, all assessed windows meet the BRE Guidance by virtue of retaining 25% of annual and 5% of winter sunlight hours.
- 6.23. The proposed scheme is therefore acceptable in daylight and sunlight terms and meet the requirements of BE20 which requires the amenity of existing / neighbouring dwellings to be protected. As advised during pre-application consultation with the Council, in daylight / sunlight terms, proposals will have limited impact on neighbouring amenity.

Transport

- 6.24. A Transport Assessment has been prepared by Royal Haskoning DHV.
- 6.25. Section 2 of the assessment confirms that the PTAL value for the site is 3, which is classified as 'moderate' accessibility. The site is within a 5 - 6 minute walk of PTAL zone 5 (at the bus stops on Bath Road adjacent to the Holiday Inn). This demonstrates the potential for encouraging non-car trips for journeys to and from the site, and it is anticipated that most guests could travel to the site by bus and rail, particularly in relation to hotel staff, as encouraged at Paragraph 103 of the NPPF.
- 6.26. It should also be noted that the PTAL calculations do not take account of the Hotel Hoppa bus services and therefore PTAL under-estimates the overall accessibility of the site location.
- 6.27. The construction of the proposed hotel within the existing car park would result in the reconfiguration of the on-site parking arrangements. As detailed in Section 3 during pre-application discussions, and in accordance with the maximum parking standards set within the London Plan, the Council have advised that they would accept a parking ratio of one car parking space for each residential unit in Building 2. On this basis and to accommodate the car parking for the other residential blocks (Buildings 3 and 4) a car parking allocation plan is proposed. This is presented in Appendix I to the Transport Assessment.
- 6.28. The car park allocation plan demonstrates how each proposed residential unit within Status Park has been allocated a car parking space and that the distance to these spaces have been limited. The parking allocations has also been considered alongside locations for bin and cycle storage across wider Status Park. Once this parking has been allowed for a total of 28 car parking bays would be provided in association with the hotel. A total of three disabled parking bays are proposed to be provided within the hotel car park. The disabled parking bays would serve the proposed hotel and are located to the eastern extent of the car park, close to the proposed main entrance to the hotel.

- 6.29. No parking standards for hotel developments are provided within the London Plan and instead proposals are assessed on a case by case basis. The submitted Transport Assessment demonstrates how based on the close proximity to Heathrow Airport and the resulting range of public transport infrastructure that the parking provision for the hotel is acceptable.
- 6.30. During pre-application discussions the LBH have indicated a need for one coach parking bay per 50 hotel bedrooms. This level of coach parking is not considered to be suitable for the development. It is anticipated that the majority of coach parties using the hotel, would be staying at the hotel prior to a flight from Heathrow Airport. As such the coach would be required to drop-off only and would not need to stay overnight. Guests would subsequently travel to Heathrow Central Bus Station to access the Heathrow Airport terminals via the Hotel Hoppa services H6 and H56 or TfL bus services 105, 111, 140, N9, 285, 423 or 555.
- 6.31. In accordance with the London Plan standards, the proposed hotel would provide a minimum of seven long stay cycle parking space and six short stay cycle parking spaces, resulting in a total of thirteen cycle parking spaces.
- 6.32. The Assessment confirms that the proposed development would not have a material impact on the existing road safety conditions and capacity on the local highway network as required under Policy 6.3 of the London Plan.

Noise

- 6.33. A Environmental Noise Survey and Acoustic Design Statement has been prepared by Hann Tucker Associates in order to assess the suitability of the site for providing a hotel use.

- 6.34. This report demonstrates that appropriate target internal noise levels are proposed and that they are achievable using conventional mitigation measures. Mitigation advice, including the use of suitability specified glazing and acoustically attenuated ventilation, has been recommended to reduce the adverse impact from environmental noise to a minimum.
- 6.35. The assessment shows the site, subject to appropriate mitigation measures, is suitable for a hotel development in terms of noise and that the requirements of Policy EM8 are met.

Air Quality

- 6.36. An Air Quality Assessment has been undertaken by Air Quality Assessments Ltd. Their report describes the existing air quality conditions in proximity to the site and considers the effect of the development on local air quality and of existing air quality on new receptors at the development.
- 6.37. The report demonstrates how the operational impacts due to increased traffic emissions as a result of the development is negligible.
- 6.38. The impacts of local traffic on the air quality for customers of the proposed hotel have been shown to be acceptable at the worst-case locations assessed, with concentrations being below the relevant air quality objectives.
- 6.39. Overall the operation air quality impacts of the development are judged to be insignificant.
- 6.40. The development is not air quality neutral with regard to transport emissions. In order to meet the requirements of Policy EM8 mitigation will need to be agreed with the council to off-set the excess transport emissions and to minimise the cumulative air quality impact of the proposed development.

Drainage

- 6.41. A Drainage Statement has been prepared by PBA to support the proposals.
- 6.42. The proposals are classified as a 'more vulnerable' use which is considered appropriate in a Flood Zone 1. In order to accommodate the proposals a drainage strategy is proposed which incorporates SuDs features to provide amenity, water quality and water quantity benefits to the development. This includes landscape depression features are proposed to act as temporary surface water storage features for storm events exceeding the 1 in 30 annual probability event.
- 6.43. In accordance with Building Regulations and having considered the requirements of Policy EM6 and Policy OE8 it has been established that the most appropriate means of surface water discharge has been determined based on the drainage hierarchy. On this basis, surface water is proposed to be discharged to TWUL surface water sewer to the south of the site.

Land Contamination

- 6.44. Phlorum has undertaken a Phase 1 Preliminary Risk Assessment, land contamination desk study

assessment of the proposed development.

- 6.45. This report demonstrates that the potential risk to the current or proposed future users of the site from any off-site contamination sources, either current or historical, are considered to be Low. The site is primarily surrounded by commercial office buildings, hotels, residential buildings and agricultural farmland, there is a potential risk of contaminants migrating onsite from the offsite historic and active landfills and factories, as well as from the road ways around the site.

Energy and Sustainability

- 6.46. An Energy and Sustainability Statement has been prepared by T16 Design to support the application.
- 6.47. The Energy Report outlines a strategy that complies with the energy requirements set out in the London Plan and Local Plan Policy EM1.
- 6.48. T16's recommendations, which will meet the policy requirement 35% reduction over part L1A and L2A 2013 as required by the London Plan and 27% total emissions (regulated and unregulated) reduction through the use of fabric improvements and renewables, is that the development uses a communal CHP system for heating and hot water, combined with an Air Source Heat Pump system.
- 6.49. In all, the scheme will deliver an improvement of 37% when compared to a building constructed to Building Regulations standards.
- 6.50. The Sustainability Report takes an overarching look at the sustainable features proposed for the scheme and how these measures will reduce its environmental impact in line with the policy requirements of the Local Authority and the London Plan. The primary areas of the design which are assessed are: passive design, water consumption, surface water and flooding, transport and landscaping and trees.

Planning Obligations

- 6.51. The Community Infrastructure Levy (CIL) Charging Schedule for Hillingdon came into effect on 10 July 2014. In accordance with the relevant regulations, in the event that planning permission is granted then the applicant is aware that they would be liable to pay CIL upon implementation of that permission.
- 6.52. In addition to this the Applicant is mindful that there may be other planning obligations in line with the Council's Section 106 SPD.

7. Conclusion

- 7.1. This Town Planning Statement has been prepared on behalf of MHA Heathrow Ltd to support a full planning application for development at Status Park. The application proposes the construction of a 140 bed hotel within the existing car park.
- 7.2. The principle for a hotel development on the site is considered to be acceptable in principle based on the site's allocation in the Council's Proposals Map as a 'Hotel and Office Growth location'.
- 7.3. The application proposals optimise the potential of a brownfield site in a sustainable location and deliver a high quality hotel scheme which will contribute to the London wide target for 40,000 additional hotel bedrooms within London by 2036. In addition to this the proposals make a contribution towards providing employment opportunities on site which is also a requirement of the NPPF.
- 7.4. It has been demonstrated that the proposals are acceptable with regard to:
- Impact on neighbouring amenity;
 - Car parking capacity for the proposed hotel building and adjacent residential developments;
 - Would not have a detrimental to highway safety and highway capacity;
 - That through appropriate noise mitigation measures that the site is a suitable local for a hotel development in terms of noise emissions;
 - That additional pollution emissions as a result of the development are negligible and that overall the operation air quality impacts of the development are judged to be insignificant;
 - That the most appropriate means of surface water drainage is proposed in accordance with the drainage hierarchy;
 - Risk from contamination sources on site are low; and
 - That the energy strategy proposed complies with London Plan standards.
- 7.5. Overall the redevelopment of the site provides the opportunity to introduce a new hotel development that reflects the character, landscape and land uses of its immediate context while responding to local and national policies. The planning policy framework indicates that the site will be well placed for Heathrow Airport ensuring that a sufficient level of hotel accommodation is available. As such, the above demonstrates how the proposals meet the economic and social dimensions to achieving sustainable development as outlined in Paragraph 11 of the NPPF.
- 7.6. The proposal has been assessed against the planning policy context and has been found to be in accordance with National and Local planning policies and guidance. The presumption in favour of sustainable development set out in the NPPF therefore applies and planning permission should therefore be granted.