

22 March 2016

**London Heathrow Hilton Hotel, Sheffield Road
in the London Borough of Hillingdon
planning application no. 36141/APP/2015/3085**

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007;
Town & Country Planning (Mayor of London) Order 2008

The proposal

Erection of a 328 bedroom 8-storey hotel with associated parking (outline application with all matters included save landscaping) within the car park of the existing Hilton Hotel at Terminal 4, Heathrow Airport.

The applicant

The applicant is **Arora Management Services Ltd** and the architect is **Unum Partnership Ltd**.

Strategic issues

The principal issues on the application site are **hotel use, employment and training, urban design, inclusive access, flooding, transport and climate change**.

Recommendation

That Hillingdon Council be advised that while the application is generally acceptable in strategic planning terms, the application does not comply fully with the London Plan, for the reasons set out in paragraph 60 of this report; but that the possible remedies also set out in paragraph 60 of this report could address those deficiencies.

Context

1 On 24 February 2016 the Mayor of London received documents from Hillingdon Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 5 April 2016 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C of the Schedule to the Order 2008:

"Development which comprises or includes the erection of a building of one or more of the following descriptions – (c) the building is more than 30 metres high and is outside the City of London."

3 Once Hillingdon Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The application site is approximately 1.5 hectares and falls within the boundary of the existing Hilton Hotel. Irregularly shaped, the site is about 500 metres south east of Terminal 4 at Heathrow airport. It lies within the Heathrow Opportunity Area and is designated on the Hillingdon Unitary Development Plan Proposals Map as part of Heathrow Airport.

Figure 1: Aerial view of application site outlined in green. Source Unum Partnership Ltd.



6 The site is currently a surface car park for the Hilton hotel and is bounded to the north and south by the Southern Perimeter Road and Sheffield Road respectively. Located immediately to the north east, is a site where the development of a new Premier Inn hotel is in progress. An electrical sub-station and some semi mature planting are located between the application site and the adjacent Premier Inn site. The adjoining airport roads are under the control of Heathrow Airport Limited (HAL), the airport operator.

7 Beyond Sheffield Road and the Great South West Road to the south and east of the site is an area of rising open grass and landscaping that forms part of the elevated Terminal 4 road system which separates the airport from residential areas within the London Borough of Hounslow. To the north of the site, beyond the Southern Perimeter Road, is the operational airfield at Heathrow Airport. This area includes a number of buildings and structures connected to Terminal 4.

8 The site currently records a public transport access level (PTAL) of 2, on a scale where 1 is the lowest and 6b the highest. Two bus services directly serve the site (482 and 490) with the bus stops being located close to the site entrance. These buses run at a frequency of 4 buses per hour. A large number of coach services also serve Terminals 4 and other airport terminals including National Express services, Reading to Heathrow Rail Air Link and Woking Heathrow Rail Air Link.

9 The nearest London Underground station is Heathrow Terminal 4, located approximately 700m west of the site. The station is served by the Piccadilly Line providing a frequent service into central London. The station is also served by the Heathrow Express and Heathrow Connect services which provide express rail links into central London.

Details of the proposal

10 The applicant is seeking outline planning permission (with all matters included save landscaping) for the erection of a 328 bedroom 8-storey hotel with associated parking at basement and ground level. The proposed hotel will also include a restaurant/bar on the first floor and will operate under Hilton's "budget" brand Hampton by Hilton, which will complement the existing 4* Hilton hotel on the site. Both hotels will be managed by the same operator and they will share parking and access.

Case history

11 There is no strategic planning history.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- | | |
|---------------------------|--|
| • Tourism/hotel | London Plan; |
| • Employment | London Plan; |
| • Urban design | London Plan; |
| • Access | London Plan; Accessible London: achieving an inclusive environment SPG; |
| • Sustainable development | London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; |
| • Air quality | London Plan; |
| • Ambient noise | London Plan; |
| • Flooding | London Plan; |
| • Transport | London Plan; the Mayor's Transport Strategy; MALP Transport; |

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plans in force for the area are the 2012 Hillingdon Local Plan: Part 1 - Strategic Policies, and Part 2 - Saved policies of the Unitary Development Plan (2007), and London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- Hillingdon Council's Local Plan Part 2 (Revised Proposed Submission Version, October 2015), which comprises Development Management Policies, Site Allocations and Policies Map, are also relevant material considerations.

Principle of development

15 London Plan Policy 4.5 'London's Visitor Infrastructure' states that the Mayor "will 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."

16 Policy 4.5 also sets a target of 40,000 net additional hotel rooms by 2036 and identifies town centres, intensification areas and Opportunity Areas (once there is adequate public transportation to central London and other international and national transport hubs) as locations for additional provision beyond the Central Activities Zone (CAZ).

17 As indicated at paragraph 6 in this report, the site is located within the Heathrow Opportunity Area. In the London Plan it is envisaged that the northern part of the Heathrow Opportunity Area will continue to benefit from airport related economic growth stemming from a number of activities including the provision of hotels and leisure/tourism. The proposed hotel will provide 328 rooms; but as it will be a budget hotel, neither conference nor meeting facilities will be provided. Given the site's close location to Terminal 4, it is expected that the hotel should be used primarily by overnight airline travellers as well as airline crew.

18 The application form submitted by the applicant indicates that 40 fulltime jobs will be created from the proposed development; however, there is no indication of a recruitment or job training mechanism that would ensure that local residents benefit from the proposal. In an effort to fulfil the requirements of London Plan policies 4.12 'Improving Opportunities for All', the applicant should seek to guarantee that local residents benefit through jobs and training. The Council should secure this as a planning condition.

19 In summary, the principle of hotel development on the site meets the strategic requirements of the London Plan.

Urban design

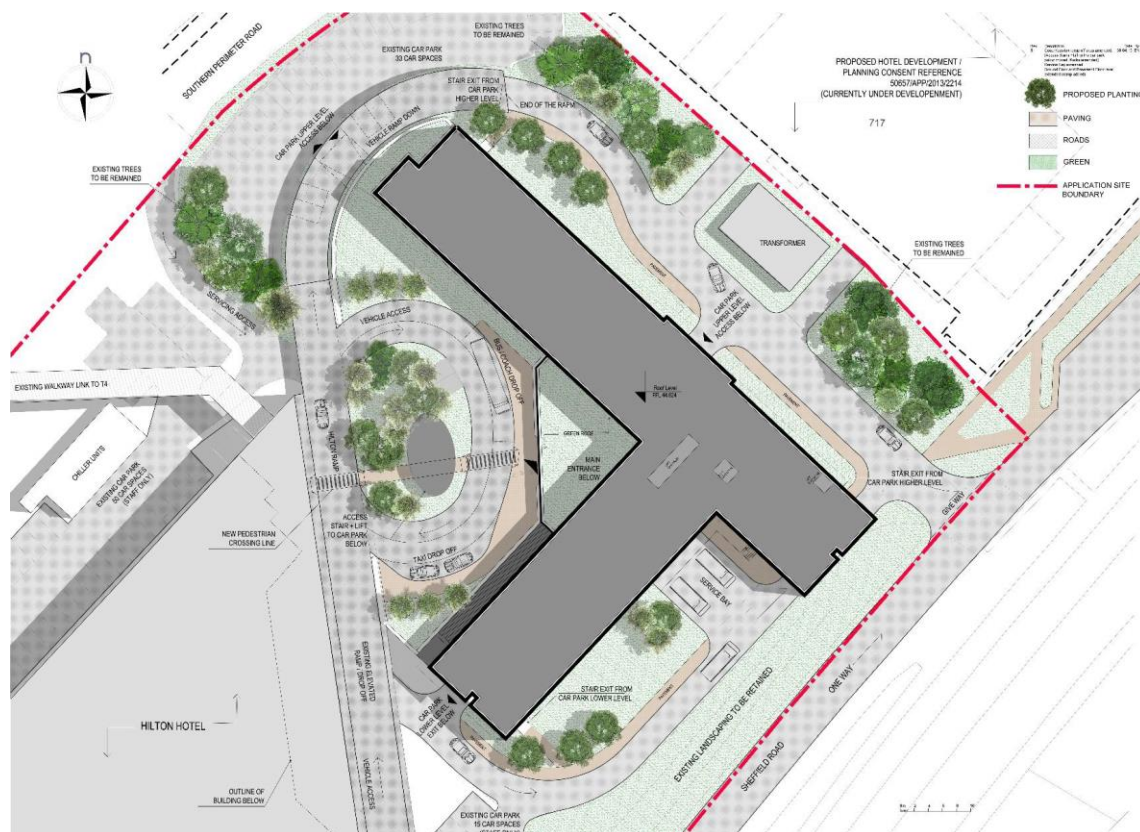
20 Good design is central to all objectives of the London Plan (2011) and is specifically promoted by the policies contained within chapter seven which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design policies in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage and World Heritage Sites, views, the public realm and the Blue Ribbon Network. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).

Layout, scale and massing

21 The majority of the site is occupied by the proposed hotel footprint, with drop off areas, service access and landscaping to the perimeter of the site. It is laid out in a "T" shape with two

wings of accommodation. This form closely echoes the shape and size of the existing surface car park and enables incorporation of a dedicated circular drop-off zone at the front entrance to the hotel, which is designed to create a courtyard effect reflective of the main entrance. This drop-off is located at level one on an elevated plaza area that is the same level as the adjacent Hilton entrance, thereby enabling cars, buses and taxis to utilise the same elevated access road as the Hilton. Parking is provided on the lower ground and ground floor of the building.

Figure 2: Application site plan. Source Unum Partnership Ltd.



22 Development on the site is constrained by a maximum building height threshold of 47m AOD that is governed by the adjacent NATS radar. The proposed 8-storey building complies with this height restriction and will also respect the hierarchy of the streets around it. In addition, the massing responds to the layouts of the adjacent Hilton and the under construction Premier Inn, which boast trapezoidal and triangular forms respectively; and it contrasts with the fragmented nature of the airport buildings.

23 There is some concern, however, about the lack of an active frontage along the north eastern boundary where the site abuts with Sheffield Road and the under construction Premier Inn. This wing of the proposed building is where the entrance to the car park is located and is predominated by car parking and electrical plant rooms on the ground floor. Notwithstanding the existing pedestrian bridge linking the adjacent Hilton to T4, the quality of the public realm, especially for pedestrians, also raises some concerns. The applicant should therefore submit a public realm strategy that demonstrates safe and accessible pedestrian routes.

Facade treatment

24 The design keeps the relief to a minimum in response to the acoustic conditions and proximity of the airport. In turn, the facades receive articulation and variation by creating subtle grading and tones of white and light grey with rhythmic positioning of windows across the elevations.

25 Varying finishes of white cladding panels have been introduced to add interest, texture and to reflect and absorb light on the facade. Acoustic requirements will also be incorporated. The corners of the building begin as solid bookends; as the elevation continues, the lighter cladding panels are introduced to create a simple elegant effect geometrical to enliven the elevation in shades of white and light grey. Given the site's location in relation to Heathrow airport, a flat roof is proposed so as to provide high visibility from below and above and also to discourage bird nesting and population.

Materials

26 The materials proposed in the design and access statement submitted by the applicant for the building are namely rain screen cladding, glazing, louvered screens and masonry, either brick or rendered to form a base where the walls meet the ground.

Inclusive Design

27 In accordance with London Plan Policy 4.5 'London's Visitor Infrastructure', at least 10% of bedrooms provided in new hotels should be wheelchair accessible. The design and access statement and drawings submitted by the applicant indicate that there will be 18 Universally Accessible rooms and 17 ambulant disable rooms resulting. The proposal will therefore meet the required 10% provision. In addition, all of the Universal Accessible rooms will be located as close as possible to the main lifts.

28 A number of other inclusive design features are proposed including wheelchair accessible lifts, reception and restaurant areas and public WC/washroom facilities, switches, sockets and controls positioned within the building to comply with the latest Part M of the Building Regulations and other features catering to the hearing and visually impaired.

29 The drop off zone will be provided immediately outside the front entrance doors of the hotel and disabled spaces will be located close to the lift serving the car park. All footway kerbs between the drop-off points and the main entrance to the hotel will be lowered as required to facilitate disabled access. A fully accessible route incorporating dropped kerbs and tactile paving will also be provided.

Transport

Highway Impact

30 TfL agrees with the Transport Assessment's conclusion that the majority of trips will be via the Piccadilly line to/from Heathrow Terminal 4 station. Most of these journeys will then connect to the hotel either via the covered walkway, the Heathrow Hoppa service, or taxi. This means only a minority of journeys in peak hours are likely to be made to/from the hotel by bus. Furthermore, it is predicted that there will be 63 arrivals and 64 departures by private vehicle in peak hours. Therefore it is considered that this development will have a minimal impact on the TLRN and subsequently TfL will not be seeking any mitigation measures.

Car parking

31 As the proposed development is being constructed in place of the existing car park on site, car parking will be shared across the two hotels, therefore reducing the overall parking provision. A provision of 272 parking spaces has been made (approximately 1 space per 2.7 bedrooms) which is a reduction from the existing 284 car parking spaces (approximately 1 space per 1.4 bedrooms). TfL is satisfied that this complies with the latest London Plan car parking standards (Policy 6.13).

Travel Plan and Construction and servicing

32 TfL expects that a draft Delivery and Servicing Plan (DSP) is submitted with proposals of this nature; this should be secured by planning condition. This will ensure compliance with London Plan policy 6.14. TfL expects the development to be supported by a Construction Management Plan (CMP) and a Construction Logistics Plan (CLP). Both of these plans should be secured by condition and/or through the s106 agreement as appropriate and should accord with TfL guidance.

33 An interim Travel Plan has been prepared for the new hotel and is deemed acceptable to TfL. The subsequent Full Travel Plan will need to be further developed in consultation with the Hillingdon Council and should be secured by planning condition.

Sustainable Development/Climate Change

Energy efficiency standards

34 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting.

35 The demand for cooling will be minimised through solar control glazing. Mechanical cooling is proposed. The applicant should provide evidence demonstrating that the cooling demand has been minimised in line with Policy 5.9.

36 As the application was submitted after the 5th of July 2014, the carbon emissions and savings should be calculated following Part L 2013 methodology and targeting a 35% carbon reduction, in line with latest GLA Guidance (<https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

37 The applicant should provide the carbon emission figure in tonnes per annum for each stage of the energy hierarchy. See Table 1 and Table 2 in the latest GLA assessment guidance for the required format. The applicant should also note that savings from the improvement in cooling performance should be included in the 'be lean' section of the energy hierarchy. The applicant should also note that when determining this baseline emissions for which the overall carbon emission saving is assessed against it should be assumed that the heating would be provided by gas boilers.

District heating

38 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant should, however, provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

39 The applicant is proposing to install a communal heat network. However, the applicant should confirm that building uses will be connected to the communal heat network.

40 The communal network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

Combined Heat and Power

41 The applicant is proposing to install a 47 kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide 65% of the domestic hot water load. The applicant should also provide a proportion of the space heating in order to optimise the CHP.

42 The applicant should note that the savings from CHP should be included in the 'be clean' stage of the energy hierarchy and should provide the carbon emission figure in tonnes per annum.

Renewable energy technologies

43 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install Air Source Heat Pumps (ASHP) to provide heating and cooling. ASHPs will also be used to provide the remainder of the hot water not by CHP. As outlined above, in order to demonstrate compliance with the energy hierarchy the use of CHP should be optimised before considering the use of renewables for heating. Further information should be provided on how the ASHPs proposed will not impact on the optimisation of the CHP system and on ensuring that the development is designed to connect to district heating in the future. The applicant should also provide information on the control strategy for ensuring that any air conditioning system installed on site is only used when needed.

Overall Carbon Savings

44 Based on the energy assessment submitted at stage I a reduction of 41% in regulated emissions compared to a 2010 Building Regulations compliant development is expected. However, the applicant should reassess the development against Part L 2013 and commit to the development exceeding 2013 Building Regulations compliance through energy efficiency alone.

45 The comments above should be addressed before compliance with London Plan energy policy can be verified.

Air quality

46 The site lies within an Air Quality Management Area and existing conditions show poor air quality with concentrations of nitrogen dioxide exceeding the annual mean objective.

47 The air quality assessment submitted by the applicant indicates that, overall, the construction and operational air quality impacts of the proposed development will be insignificant provided that a number of mitigation measures are implemented both during the construction and operational phases.

48 Given the location of the site within the airport boundary, it is recommended that the Council should secure the mitigation measures identified in the assessment through appropriate conditions.

Noise

49 It was found that the assessment of noise during both the day time and night time are likely to have an adverse impact on the proposed redevelopment in accordance with Hillingdon's supplementary planning document relating to noise and WHO criteria.

50 In the case of granting planning permission it is recommended that, sufficient insulation of the hotel rooms' front facade should be calculated according to BS 8233:1997. The applicant has demonstrated that this performance can be achieved with acoustic secondary glazing and a blockwork cavity façade. The Council should ensure the proposed mitigation measures are conditioned.

Flood risk assessment

51 London Plan policy 5.12 'Flood risk management' seeks to ensure that flood risk is adequately assessed and considered in the location and design of new development and that sustainable drainage methods are employed where appropriate to address flood risk issues. London Plan Policy 5.13 'Sustainable drainage' notes that unless practical reasons that prevent their use exist, sustainable urban drainage systems (SUDS) should be utilised to achieve greenfield run-off rates and to ensure surface water run-off is managed close to its source and in line with the drainage hierarchy wherever possible.

52 The applicant has submitted a Flood Risk Assessment (FRA) prepared by Cole Easdon Consultants Limited, which considered risk to the proposed development from various sources, such as fluvial, sewers, groundwater, reservoirs, drains, ditches and overland flow. The report confirms that the application site lies within a flood zone 1 and as such flood risk from all sources is considered to be low.

53 To mitigate flooding and surface water run-off, the FRA proposes a below ground cellular storage tank, green roofs and landscaping. In addition, access to the proposed ground floor of the hotel will be situated at an elevated level to the existing ground level. It is also proposed that all SUDS facilities will be maintained privately by the end users or a private management company acting on their behalf.

54 Given the above strategy, the applicant has demonstrated that appropriate measures have been identified to mitigate flooding and surface water run-off. The Council should ensure that the proposed mitigation measures are secured through appropriate conditions.

Community Infrastructure Levy

55 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3, which will contribute towards the funding of Crossrail. The Mayor has arranged boroughs into three charging bands. The rate for Hillingdon is £35/sq.m. The required CIL should be confirmed by the applicant and Council once the components of the development or phase thereof have themselves been finalised.

56 London Councils are also able to introduce CIL charges, which are payable in addition to the Mayor's CIL. Hillingdon has adopted a CIL charging schedule and more details are available on the Council's website.

Local planning authority's position

57 Hillingdon Council's position is unknown at this time.

Legal considerations

58 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (the next bit is optional) and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

59 There are no financial considerations at this stage.

Conclusion

60 London Plan policies on hotel development, employment, urban design, inclusive design, accessibility, energy, air quality, noise, flooding and transport are relevant to this application. The application is broadly acceptable in strategic planning terms, however further information or action is needed on the matters set out below:

- **Employment and training:** the provision of jobs for local residents and on-the-job training for young people interested in pursuing a career in the hospitality industry should be secured as a planning condition.
- **Urban design:** the applicant should seek to introduce a more active frontage along the north eastern block and submit a public realm strategy outlining safe and accessible pedestrian routes.
- **Transport:** a Draft Delivery and Servicing Plan (DSP), a Construction Management Plan (CMP), a Construction Logistics Plan (CLP) and a full Travel Plan should be prepared in accordance with TfL guidance and secured by planning conditions or the s106 agreement as appropriate.
- **Climate change:** the applicant should submit the information requested in paragraphs 30–39 of this report and in doing so pay close attention to the methodologies recommended in the same paragraphs.
- **Noise and air quality:** the proposed mitigation measures should be conditioned.
- **Flooding:** the proposed mitigation measures should be conditioned.

61 Whilst the application is broadly acceptable in strategic planning terms, on balance, it does not fully comply with the London Plan.

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