

25 February 2016

15 – 17 Uxbridge Road, Hayes

in the London Borough of Hillingdon

planning application no.69827/APP/2015/4719

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

Construction of a 2 to 12 storey apart - hotel to provide 131 self-contained Guest Suites/Rooms and associated facilities including a hotel lounge, meeting rooms and gym.

The applicant

The applicant is **Rock Venture Holdings Limited**, the agent is **Indigo Planning** and the architect is **Juttla Architects**.

Strategic issues

Principle of land use: apart/hotel on the application site, **employment, urban design, access, sustainable development/energy, flooding** and **transport** are the key strategic issues relevant to this planning application.

Recommendation

That Hillingdon Council be advised that the application broadly complies with the London Plan. However, there are few issues that must be addressed as set out in paragraph 60 of this report.

Context

1 On 20 January 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 1 March 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:

- "1. 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 located on the Uxbridge Road, Hayes in the London Borough of Hillingdon. It is located on the southern side of Uxbridge Road (A4020), approximately 290m from the boundary with Ealing. The site is currently vacant with the previous use comprising of the Waggon and Horses Public House, employing 3 to 4 people and including an element of bed and breakfast accommodation. There has also been a car repair workshop on the site previously.

6 As shown below, there are industrial and business uses, office buildings, retail and residential all surrounding the site. The southern side of Uxbridge Road is primarily dominated by retail parks and business units and the northern side is characterised by housing (two-storeys in height) and a short parade of shops. This is across the dual carriageway. To the east of the site is landscaping. Uxbridge Road Retail Park which includes Wickes and Carpet Right is located east of the site. South of the site are industrial buildings.

7 Immediately adjacent to the site at 27 Uxbridge Road is Heathrow Gate Hotel which identifies as a landmark building in the area. It is a 13-storey tower, formerly vacant B1 office building which is currently being converted into a 170-bedroom hotel for the Hyatt Group following the award of planning permission in 2014.

8 The site, is located on the south side of the A4020, Uxbridge Road, which is a Strategic Route Network (SRN) road. A two-way cycle lane on the A4020 runs across the two accesses; on the other side of Uxbridge Road is a one-way bus priority lane running into the centre of London. The Hayes Bypass, 450m to the east is the nearest Transport for London Route Network. The site is not within walking distance of any rail services, the nearest station (Southall) being over 1.5km away, but there are nearby (c.200m) stops for three bus routes on Uxbridge Road, the 207, 427 as well as night bus N207. As such, the site records a moderate public transport accessibility level (PTAL) rating of 2 to 3, on a scale of 1 to 6 where 6 is the most accessible.



Aerial view of the application site: Source – applicant's design and access statement.

Details of the proposal

9 This full planning application is for the construction of a 2 to 12-storey apart - hotel to provide 131 self-contained Guest Suites/Rooms to run in conjunction with the adjacent 13-storey Hays/Heathrow Gate Hotel. This proposal comprises 131 rooms in total and the split is as follows:

- 30 x guestrooms;
- 74 x studio kitchen suites;
- 24 x 1-bed kitchen suites; and
- 3 x 2-bed kitchen suite.

10 The proposal also consists of the following ancillary elements:

- A basement gym and changing rooms;
- Restaurant, bar and lounge; and
- Two meeting rooms.

Case history

11 On 10 November 2015, a pre-application meeting was held at City Hall comprising the applicant / agent and GLA / TfL officers. An advice report was issued supporting the proposal in terms of land use principle, but concerns in regard to design, energy and transport were flagged up to be addressed.

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;*
- 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 the 2015 London Plan (Consolidated with Alterations since 2011).

14 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework, the draft Minor Alteration to the London Plan (MALP, 2015), and the Council's Submission Version Local Plan Part 2 which comprises - Development Management Policies, Site Allocations and Policies Map, are also relevant material considerations.

Principle of land use – Apart / Hotel

15 The London Plan clearly defines the Apart / Hotel as Self-contained hotel accommodation (C1 use class) that provides for short/long-term occupancy purchased at a nightly rate with no deposit against damages. They will usually include concierge and guest room service, and include formal procedures for checking in and out. Planning conditions may limit length of stay to occupiers.

16 Policy 4.5 of the London Plan bullet point (e) states that the Mayor, and boroughs and relevant stakeholders should recognise the need for apart - hotels in the context of the broader policies of the Plan and in Para 4.30, it advises that in considering proposals for apart-hotels boroughs should take particular account of their potential impacts on housing capacity.

17 The apart-hotel will operate in a similar way to a hotel, in that it offers serviced, short or long-stay accommodation with communal areas. The key difference between the two types of accommodation is that an apart-hotel provides a more spacious, flexible, alternative to hotels, whilst

maintaining the same level of service. An apart-hotel offers customers the option to hire suites, which contain long stay amenities, rather than short stay guestrooms.

18 Considering the above points and given the fact that there is evidence at a strategic planning level for a demand of such accommodation, the proposal for an apart-hotel on the site is supported in land use principle. The Council may limit the length of stay to occupiers by an appropriate condition.

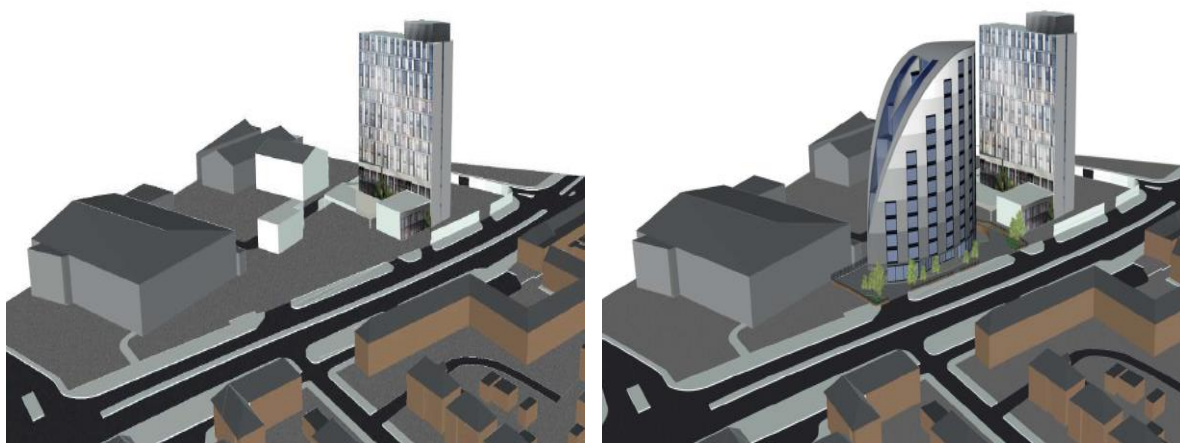
Employment and training

19 The applicant has stated that the staffing need of the apart/ hotel is approximately 100. The applicant also confirmed that the facility will provide apprenticeships and on-the-job training for young people interested in pursuing a career in the hospitality industry. This is welcomed, and should be secured through section 106 agreements.

Urban design

20 The scheme provides 131 guestrooms and suites in total. The design of the proposed scheme does not present any serious strategic concern. Whilst its 12-storey height is in keeping with the emerging contextual height of the 13-storey adjacent hotel building and reflects the overall hierarchy of streets, the layout of the scheme reflects the aspirations of improving the quality of Uxbridge Road. This is supported.

21 Layout and landscaping: The internal layout of the building creates a relatively well animated front to the building facing Uxbridge Road providing active uses, contributing to the sense of safety and overlooking of the public realms which is welcomed. The applicant has considered the advice provided at the pre-application meeting and great care has been taken ensuring that the space in front of the building is designed as a better pedestrian environment, and that it is perceived as an extension of the public realm. The proposed planting and landscaping features allow for easy movement of pedestrians across and along this area. The landscaping has been improved significantly since the pre-application meeting, as demonstrated on the updated application drawings. Outdoor seating is incorporated, facilitating an enhanced public realm environment. The applicant has provided a detailed landscaping scheme, which will evolve throughout the planning application process and be finalised via a planning condition. This is supported.



Existing and proposed massing, respectively: Source - applicant's design and access statement.

22 Height, scale and massing: The proposal includes redevelopment of the site to provide a curved building on elevation. To the western boundary, the building reaches its maximum height of 12 storeys, which is one below the existing adjacent tower. This helps create a meaningful relationship in height and scale between the proposed building and the adjacent building. Between the east and west elevations of the building there is a gradual increase in height, whilst also

widening on plan and curving on elevation. The scale of the building acknowledges the proportions of the adjacent Heathrow Gate Hotel tower and retail buildings. This is reflected in the overall height of the building at either end of the site, which acts as a median between the varying building scales in the immediate context. In order to supplement the overall stepping design of the building on elevation, the building has a dynamic elliptical footprint. With each increase or decrease in the height of the building, the overall width of the building also varies respectively. As such, the building is the widest at the centre of the building, and narrowest at the ends. This sweeping stepping arrangement on the plan and elevation of the building helps to reduce the mass of the building when viewed from any angle. In general, the height, scale and massing is supported.



Proposed perspectives and appearance of the accommodation: Source – applicant’s design and access statement.

23 **Appearance and materials:** The amended drawings that considered the advice provided include updated ground floor plan and elevations which do take on board the GLA’s comments. In particular the elevations have been amended to ensure that the window fenestrations are uniform and regular. The gradual curve to the façade helps hide the physical stepping of the building from five to twelve stories, and presents a building that is energetic and that enhances the site. As well as this, the ground floor has been set in further to soften the Uxbridge Road elevation and allow further activity to be created on this frontage. A distinctly different element of the facade separate to the upper floors has been added, and as such a significant set has been introduced into the entrance area, which also helps to more clearly define the entry to the building. A grey powder coated finish to the aluminium frames will complement the elevations and present a contemporary finish to the building. The windows to the south elevation will incorporate a solar shading system that will be in a similar finish to the louvres seen at roof level. This will ensure that the south facing bedrooms do not encounter overheating or uncomfortable levels of direct sunlight.

24 At the pre-application meeting it was discussed to explore extending the ground floor treatment up to the first floor and accentuate the corner adjacent to the existing hotel. The applicant stated that this issue has been considered, however, the applicant said this option didn’t allow the ground floor to sit independently from the upper floors, and also posed problems with integrating into the cladding to the upper floors. For these reasons, the applicant concluded that this would not be feasible. In this instance, the applicant’s conclusion is accepted.

25 Overall, the proposed design is a positive development for the area and is supported.

Inclusive design

26 The revised design and access statement states that the building has been designed with accessibility in mind and it has taken into account various statutory requirements and guidance into account, namely Part M of the Building Regulations, Lifetime Homes Standards, BS8300:2009 and PAS88:2008. The statement states that in the case of the proposed scheme, the visitor's interaction and use of the building have been considered in the following key areas.

27 Facilities within building – Throughout the building and in particular the guestrooms, provision has been made to allow disabled users to fully enjoy the facilities of the hotel. Where required, controls, switches, sanitary ware, positioning of services etc have been considered to allow inclusivity within the building to allow independent use of the facilities by all potential users. Suites have been designed and laid out to allow wheelchair users to visit any particular room. There will provision made to allow independent use of 10% of the total suites in the building, i.e. 13 suites. These fully wheelchair accessible rooms are located on the lower levels of the building (first and second floors close to lifts) They are clearly shown on the floor plans. The rooms are all located adjacent to each other to allow easy servicing of the rooms, whilst also enabling bookings that require multiple rooms containing accessible facilities. A mobile hoist system will be employed with the hotel to enable a flexible use of the rooms and suites available.

28 Access within building – There are level accesses throughout the building, and where there are any significant changes in level, suitable ramped access has been provided. Internal door openings, corridors and internal rooms spaces are wide enough for wheelchair access and for multiple users passing through. Vertical circulation including stairs and lifts have been appropriately designed to comply with minimum dimensions and appropriate accessibility in compliance with the above standards.

29 Access to the site and building – Car parking has been provided at ground level for disabled visitors and guests. The location provides the shortest and most accessible position for any disabled users. There are level thresholds and approaches to the building, with any change in surface or level clearly distinguished.

30 To summarise, the applicant has followed the advice provided during the pre-application meeting and as detailed above, the revised design and access statement with the accompanied drawings has demonstrated that the scheme fully complies with policies 7.2 and 4.5 of the London Plan. In addition to this the applicant has advised that an accessibility management plan (AMP) will be provided by the hotelier that will run the hotel and has agreed that the submission of the AMP will to be secured by appropriate conditions including the above proposed measures.

Sustainable development/energy

Energy efficiency standards

31 A range of passive design features and demand reduction measures are proposed and that the hotel will be monitored by a Building Management System (BMS), this is welcomed.

32 The demand for cooling will be minimised through solar control glazing and external shading through brise-soleils. However, the applicant has stated that they dynamic thermal modelling undertaken suggests that the level of overheating is significant and is proposing VRF cooling to provide cooling throughout. The applicant should provide details of the overheating analysis in order to demonstrate that the cooling demand has been sufficiently reduced.

33 The development is estimated to achieve a reduction of 27 tonnes per annum (5%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.

District heating

34 The applicant has confirmed that there are no existing or planned district heating networks within the vicinity of the proposed development. As requested at the pre-application meeting, the applicant should investigate the feasibility of serving both this site and the neighbouring site (27 Uxbridge Road), which is currently being redeveloped, via a single energy centre. The applicant should also provide a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

35 The applicant is proposing to install a communal heat network, however it should be confirmed that the communal network will be supplied from a single energy centre. A plan showing the floor area and location of the energy centre should also be provided.

Combined Heat and Power (CHP)

36 It is proposed to install a 35 kW_e /60 kW_{th} gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load. A reduction in regulated CO₂ emissions of 77 tonnes per annum (13%) will be achieved through this second part of the energy hierarchy. The savings for the size of the CHP appear very high for the size of the engine proposed, for instance a 35kW_e CHP running for 5,000 - 6,000 hours the savings would be in the order of 18 - 21 tonnes per annum. The applicant should provide further information on how the 'Be clean' savings have been estimated, including estimated running hours of the CHP, details of any thermal store, suitable monthly demand profiles (for heating and electrical loads) and BRUKL sheet for the 'be clean' case i.e. no ASHP (Air Source Heat Pumps) for heating. The applicant should also provide information on the management arrangements proposed for the system, including anticipated maintenance costs, given that the management and operation of small CHP systems can significantly impact their long term financial viability.

Renewable energy technologies

37 It is proposed to install Photovoltaic (PV) panels and ASHP for space heating and domestic hot water top up. 100 sq.m. of PV panels are to be installed on the roof of the development. A roof layout drawing detailing the location of the PV array should be provided.

38 The proposed ASHP is to provide space heating and peak hot water temperatures. Clarification is required on how the ASHP will operate alongside the CHP communal heating system, including providing a schematic of the heating systems for the development. The applicant should also demonstrate that the use of CHP has been optimised, in line with the energy hierarchy, before considering the use of renewable technologies.

39 Further information is required on how the (coefficient of performance) COPs for heating and cooling have been determined, for instance the COP should be calculated based on the proposed supply temperatures (both the space heating and peak hot water) and source temperature (air, waste heat, etc.) and not the manufacturer's datasheet which may only be quoted for low temperatures (i.e. not suitable for hot water). The applicant should also provide further information on how the system will be compatible with connection to a district heating network should one become available in the future.

40 A reduction in regulated CO₂ emissions of 219 tonnes per annum (37%) will be achieved through this third element of the energy hierarchy.

Overall Carbon Savings

41 Based on the energy assessment submitted at stage I, the table below shows the residual CO₂ emissions after each stage of the energy hierarchy and the CO₂ emission reductions at each stage of the energy hierarchy.

42 Table: CO₂ emission reductions from application of the energy hierarchy:

	Total residual regulated CO₂ emissions	Regulated CO₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(%)
Baseline i.e. 2013 Building Regulations	591		
Energy Efficiency	564	27	5%
CHP	487	77	13%
Renewable energy	268	219	37%
Total		323	55%

43 A reduction of 323 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 55%. However, it was noted that the final BRUKL document suggests that the carbon emission savings for the development will be approximately 35% rather than the 55% quoted in the energy statement. The applicant should provide clarification on how the carbon emission savings have been calculated for the development. The BRUKL sheets for each stage of the energy hierarchy should also be provided.

44 The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan. However, the comments above should be addressed before compliance with London Plan energy policy can be verified.

Flooding

45 Flood risk: Environment Agency mapping reveals that the < 1ha site is in Flood Zone 1 and so will not require a Flood Risk Assessment. Environment Agency mapping also reveals that the site is not at risk of significant surface water flooding. However, parts of the immediate catchment are at risk, including an adjacent stretch of Uxbridge Road. The proposals are acceptable in terms of London Plan policy 5.12 (flood risk).

46 Drainage: Given the potential of the development proposals to contribute to surface water flooding in the wider area, application of London Plan policy 5.13 will be important. No Drainage Strategy has been submitted as part of the planning application. This is an unacceptable approach with regard to London Plan policy 5.13. The following sustainable drainage methods are likely to prove feasible in this case:

- Green roof
- Landscaping designed to maximise storage/absorption of rainwater
- Possible infiltration
- Rainwater harvesting

47 Prior to the commencement of any development, the details of sustainable drainage measures should be submitted to and agreed by LB Hillingdon Lead Local Flood Authority.

Transport for London's comments

48 This application was the subject of detailed comments issued by TfL to Hillingdon Council on 29 January 2016. The assessment below incorporates a transport technical note with revisions which the applicant forwarded on 22 February 2016.

Vehicle Access and Car Parking

49 The two extant vehicular accesses into the site are very wide and the applicant has agreed to TfL's advice to narrow them to minimise the impact of turning vehicles on the adjacent footway and cycle lane.

50 The proposal includes the creation of a new 2-way ramped basement with 11 car parking spaces. Two spaces will be allocated for use by management staff leaving 9 spaces for able-bodied guests. There will be a further 2 disabled spaces at ground level near the entrance. TfL considers these access arrangements acceptable. The applicant has committed to providing electric vehicle charging points to London Plan standards, which would equate to two active and two passive – both to be secured by condition.

Cycle parking

51 As the submitted original design was not acceptable, TfL advised that parking should be safe, covered and secure with good lighting and CCTV. The revised drawing and photo initially supplied did not meet with the 'secure' requirements, however TfL has since received written confirmation that the application will comply with all of the above. In place of the previously-proposed butterfly clips, the development will employ Sheffield-type stands which can be locked at two points, allowing secure parking for a total 24 bicycles in the curtilage of the site, good lighting and monitoring by CCTV surveillance cameras. The long stay parking will be covered and enclosed with lockable doors to be controlled by a key or key fob accessible to staff only creating a secure cycle compound. Short stay cycle parking will also be secured and covered from the elements. A final plan showing these minor revisions is promised. The quantum now exceeds the revised London Plan minimum cycle parking quantum standards of 1 space per 20 rooms long-stay and one space per 50 rooms for short-stay and following the design update and further justification for the location and its security, TfL now supports the cycle parking proposals.

Buses

52 A shuttle bus service is proposed, to be shared with the adjacent hotel site (nearly completed construction) which is under the same ownership. The applicant has accepted this is a necessary mitigation for the transport impacts of this – in fact both- developments and has agreed to have this secured by condition or within the s106 for this site and also embedded in the travel plan with monitoring targets. It is recommended that promotion, frequency, review arrangements and duration of the service is discussed, for inclusion in the s106. Having assessed the development's impact on its own bus network, TfL considers there should be sufficient spare capacity to accommodate the additional demand generated by the site, and that the two nearest bus stops/shelters currently comply with accessibility design standards.

Servicing, Construction

53 TfL is content with the servicing provision on-site, and the applicant has responded adequately to the request for better swept-path analysis. A delivery and servicing plan (DSP) should be secured by planning condition or within the s106. This will ensure compliance with current London Plan policy 6.14. TfL also similarly expects the Council to secure a construction management plan (CMP) and a construction logistics plan (CLP).

Travel planning

54 The applicant has supplied a revised framework travel plan (TP) at TfL's request which will be secured through the s106 agreement. It now passes the ATTrBuTE assessment and it is understood certain elements will benefit from shared and co-operative arrangements with the adjacent hotel.

Community Infrastructure Levy (CIL)

55 The proposed development is within the London Borough of Hillingdon, where the Mayoral charge is £35 per square metre gross internal area. More details are available via the GLA website <https://london.gov.uk>.

Summary

56 Following revisions and further information, TfL is now content to support the proposals. The provision of the detailed plan documents and the shuttle bus arrangements discussed above should all be secured by appropriate planning conditions and obligations.

Local planning authority's position

57 Hilligdon Council planning officers have yet to confirm their position on this scheme.

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 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 **principle of land use: apart / hotel, employment, urban design, access, sustainable development/energy, flooding** and **transport** are the key strategic issues relevant to this planning application. The proposed development broadly complies with the London Plan. However, there are few issues that must be addressed as set out below:

- **Principle of land use:** The proposed apart / hotel is supported in terms of land use principle.
- **Employment:** The scheme generates 100 full-time jobs and will provide apprenticeships and on-the-job training for young people interested in pursuing a career in the hospitality industry. This is welcomed and should be secured through section 106 agreements.
- **Urban design:** The proposed design is supported. All the measures should be conditioned.
- **Inclusive access:** The revised access statement incorporates inclusive design fully compliant with policies 7.2 and 4.5 of the London Plan. The proposed measures and the submission of the accessibility management plan need to be secured.
- **Sustainable development/energy:** The carbon savings exceed the target set within Policy 5.2 of the London Plan. However, the comments provided in the energy section should be considered and clarified before compliance with London Plan energy policies can be verified.
- **Flooding:** As the site is less than 1 hectare, flood risk assessment is not required. However, a drainage strategy should be submitted to and agreed by LB Hilligdon Lead Local Flood Authority.
- **Transport:** Following revisions and further information, TfL is now content to support the proposals. The provision of the detailed plan documents and the shuttle bus arrangements discussed above should all be secured by appropriate planning conditions and obligations.

For further information, contact GLA Planning Unit (Development & Projects Team):

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