

20 November 2013

**Building 717, Matrix Site, Sheffield Way & Southern Perimeter Road,
Terminal 4, Heathrow Airport**

in the London Borough of Hillingdon

planning application no.2013/2214

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

Demolition of existing warehouse buildings and erection of 602 bedroom 8 storey hotel with associated car parking. (Outline application with details of access, appearance, layout and scale).

The applicant

The applicant is **AP14 Limited C/O Arora Management Services Limited**, and the architect is **Urban Innovations**.

Strategic issues

Principle of hotel use, urban design, inclusive design, sustainable development, flooding, employment and training, and transport are the key strategic issues which are relevant to the proposed development.

Recommendation

That Hillingdon Council be advised that the application does not comply with the London Plan, for the reasons set out in paragraph 55 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies.

Context

1 On 14 October 2013 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 22 November 2013 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 1B of the Schedule to the Order 2008: *"Development (other than development which only comprises the provision of houses, flats or houses and flats) which comprises or includes the erection of a building or buildings - (c) outside Central London and with a total floor space of more than 15,000 square metres."*

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 As shown below, the application site at the Matrix Site on Sheffield Way has an area of 0.62ha and is roughly triangular in shape. The site extends fully to the kerb line of the adjacent roads such that the grass verges, footways and trees adjacent to the highway are within the same ownership. The adjacent roads are not adopted but are controlled by BAA the airport operator.

6 The site is designated on the Hillingdon Development Plan Proposals Map as part of Heathrow Airport. In 2008 the site, along with a large portfolio of airport properties at Heathrow and other London airports and elsewhere was purchased from the airport operator by the Arora Group which has since leased the building.

7 Over recent years the airport operator has utilized the building on the site, via a contractor, for security screening purposes. A small security booth is sited at the site's only access point at the eastern corner of the site off Sheffield Way which is controlled by security barriers. The open areas of the site are laid to tarmac.

8 Adjoining the site to the west is the car park of the Hilton Hotel which incorporates a sub-station and some planting alongside the boundary with the application site. The other boundaries of the site adjoin airport roads which are under the control of BAA, the airport operator. Beyond Sheffield Way 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 beyond within LB Hounslow. To the north of the site beyond the Southern Perimeter Road is the operational airfield at Heathrow Airport. This includes a number of buildings and structures including a radar installation as well as aircraft stands and piers connected to Terminal 4.

9 The nearest section of the Transport for London Road Network (TLRN), the A30 Great South West Road is approximately 30m south of the site. The nearest station is Heathrow Terminal 4, which is approximately 500m north west of the site, served by the Piccadilly Line and Heathrow Express/Connect rail services to Paddington. Two bus routes; 482 and 490 serve bus stops on Southern Perimeter Road. The site therefore has a low public transport accessibility level (PTAL) rating of 2 on a scale of 1 to 6, where 6 is the most accessible.

Details of the proposal

10 The application is made in outline with landscaping being the only reserved matter. It proposes the demolition of all buildings on the site and erection of an 8-storey, Whitbread Premier Inn budget hotel comprising 602 bedrooms.

Case history

11 The site has a long planning history. The recent one relevant to the current application was (36141/APP/2003/1605), renewal of planning permission ref.36141/y/98/2124 dated 28/10/1999; erection of a 7 storey extension to provide 245 bedrooms, plus conference facilities, vehicular access, parking and landscaping (involving demolition of existing warehouse). Approval on 24/11/2005.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Tourism/leisure *London Plan; Good Practice Guide on Planning for Tourism (DCLG)*
- Employment *London Plan;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*

- Ambient noise *London Plan; the Mayor's Ambient Noise Strategy;*
- Air quality *London Plan; the Mayor's Air Quality Strategy;*
- 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*

- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Hillingdon Core Strategy and the 2011 London Plan (with 2013 Alterations).

14 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework are also relevant material conditions.

Hotel use and employment

15 Policy 4.5 'London's visitor infrastructure' of the London Plan 2011 states that the Mayor supports London's visitor economy and stimulates 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 The Mayor's Tourism Vision sets out key objectives to develop the quality of accommodation; enhance visitor perceptions of value for money and improve the inclusivity and accessibility of the visitor experience. To ensure adequate hotel provision this Plan sets a target of 40,000 net additional hotel rooms by 2031, recognising that over this period London may 'mature' as a visitor destination leading to a reduction in historic growth rates.

17 The site is located outside Hillingdon Town Centre but is within the indicative boundary for the wider hinterland of the Heathrow Opportunity Area. Additionally, the site's location within the boundary of Heathrow Airport is of course recognised.

18 The hotel provides 602 bedrooms, with no conference or meeting spaces as it operates in the budget sector and its location, close to Terminal 4 ensures that it should be extensively used for overnight accommodation by airline travellers and crews using Terminal 4. The special role played by terminal hotels, is illustrated by the Terminal 4 Hilton Hotel adjoining the application site which was permitted following the construction of Terminal 4 and more recently by the Terminal 5 Sofitel Hotel permitted as an integral part of the Terminal 5 development. It is also acknowledged that demand for a hotel in the Central Terminal Area is high and it is noted that the airport operator has an aspiration to provide a hotel within the CTA following completion of the new Heathrow East Terminal.

19 It is considered that such terminal hotels are sustainable because they enable airline passengers to more easily access a hotel at Heathrow Airport via public transport. They reduce the transfer time between the hotel and terminal and remove the need for vehicle trips on any public roads outside the airport boundary. Therefore, as the development caters for a wider range of passengers who will benefit from a budget hotel close to the terminal – particularly transfer passengers, the proposed scheme is supported in principle.

20 It is envisaged that the proposals will create around 165 new full time equivalent jobs including 34 part time job opportunities. Employment per room is anticipated to be higher than standard Premier Inns due to the high demand generated at Terminal hotels where proximity to flights at T4 will generate strong demand from aircraft passengers and crew. The applicant stated that, in accordance with its corporate policy, Premier Inn will advertise the positions locally and Whitbread Group Plc provides training opportunities for its staff. That said, as agreed with the Council's planning officers during the pre-application discussions the commitment for the provision of hospitality skills training should be secured through section 106 agreements.

21 It is noted that the applicant is in consultation with NATS in regard to the development impact on the radar navigation system, particular area of concern is on "crane operation plan" during the construction stage. A suitable planning condition is anticipated to be agreed by both parties.

22 To summarise, the principle of redevelopment for hotel use is acceptable, provided the airport navigation concern is resolved.

Urban design

23 Layout, scale & massing: The shape of the building is triangular reflecting the shape of the site and incorporates a central atrium. Most of the site is occupied by the proposed hotel footprint, with drop off areas, service access, parking and landscaping to the perimeter of the site and undercroft of the building.

The proposed massing constitutes an 8-storey building including a ground floor with 84 car parking spaces and access points. The form of the building responds in contrast to the fragmented nature of the buildings to the north of the site while complementing the strong form and mass of the neighbouring Hilton Hotel. The form has a central courtyard that permits light to flood into the building while also allowing external space that is sheltered from the surrounding roads.

24 Facade treatment: The design keeps the relief to a minimum in response to the the acoustic conditions and proximity of the airport. In turn, the facades receive articulation and variation by creating a grading from light to dark with rhythmic positioning of windows across the elevations. Two large solid ends help give orientation to the building and its position.

25 Varying finishes of white and light grey cladding panels have been introduced to add interest, texture and to reflect and absorb light on the facade. The bedroom windows will have white/grey double-glazed windows. The hotel entry level glazing will have aluminium double glazed curtain walling system, with white/grey coloured glazing to feature windows. 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 digital raindrop effect to enliven the elevation in shades of white and light grey.

26 Materials: The design and access statement states that the materials proposed for the building are namely rain screen cladding, glazing, louvered screens and masonry, either brick or rendered. On the internal courtyard elevations the grey skin of the box has been removed. These elevations are to receive a white render finish to create a bright reflective courtyard space.

27 To summarise, officers are supportive of and agree, in principle, that the design approach and the facade treatment could help deliver a quality building.

Inclusive design

28 The design and access statement and the drawings submitted demonstrate that of the proposed 602 bedrooms, 5% (30) will be Universally Accessible (fully wheelchair accessible) and another 5% (30) will be Ambulant Disabled (easy access) rooms. Furthermore, it is shown that the wheelchair accessible rooms will be positioned as close as possible to the lifts and all other areas, reception, bar and

restaurant of the hotel will be designed to enable wheelchair users to visit and use. There will be fully accessible WC/washroom facilities provided on the hotel entry level. All switches, sockets and controls will be positioned within the building to comply with the latest Part M of the Building Regulations.

29 Whilst the above proposals are welcomed, the provision of 10% wheelchair accessible rooms from the outset needs to be secured. It should be noted that the 10% provision of wheelchair accessible rooms is a minimum policy requirement of the London Plan (policy 4.5), and therefore at least 62 bedrooms should be wheelchair accessible from the outset and not clustered, but spread out along the floors.

30 The design and access statement considered a general approach to the provision of adequate disabled access and transport links with the surrounding area; approaches to and around the site; the entering and exiting of the building; circulation routes within the development; the provision of adequate facilities within the development and the provision of clear and legible signage to assist way finding and potential evacuation. The provision of 8 disabled parking spaces out of the total 82 car parking spaces is welcomed and supported.

31 To summarise, all the above proposals and policy requirements in terms of inclusive design should be conditioned. Hotel accessibility management plan should also be provided and its submission conditioned.

Noise

32 The assessment of noise during both the day time and night time are likely to have an adverse impact on the proposed development in accordance with Hillingdon's supplementary planning document relating to noise and WHO criteria.

33 In the case of granting planning permission it is recommended that, sufficient insulation of the bedrooms 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 an enhanced facade treatment. The Council should ensure the proposed mitigation measures are conditioned.

Air quality

34 The air quality impacts associated with the construction and operation of the proposed hotel development at the Matrix Site within Heathrow Airport boundary have been assessed. Existing conditions within the study area are poor, with concentrations of nitrogen dioxide exceeding the annual mean objective. An AQMA has been declared for this area.

35 The air quality assessment states that the proposed development will have an imperceptible effect on local air quality and the impacts at all existing receptors are negligible. However, given the location of the site, which is within the airport boundary, it is recommended that the applicant should investigate and implement mitigation measures for the worst scenario, and the Council should secure these through appropriate conditions.

Sustainable development/energy

36 Energy efficiency: A reduction of 85 tonnes per annum (5%) in regulated CO₂ emissions to be achieved compared to a 2010 Building Regulations compliant development (see table below). The applicant should provide supporting information such as BRUKL sheets for the energy efficiency only case (i.e. excluding CHP and air source heat pumps) to confirm the carbon savings claimed.

37 District heating: The applicant should investigate whether there are any existing or planned district heating networks in the vicinity of the development and provide a commitment to ensuring that the development is designed to allow future connection should one become available. A site heat network is proposed to provide domestic hot water to all the rooms and space heating via air source heat pumps and fan coil units. Space heating to all rooms and other building uses should be provided in a way that allows connection to a district heating network in the future. Further information on the space heating distribution system is required to confirm that it is suitable for connection to district heating. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

38 Combined Heat and Power (CHP): A CHP is proposed as a lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load. Further information is required on the capacity of the proposed CHP. This should be supported by energy demand profiles for the building and explanation of the proposed sizing. A reduction in regulated CO₂ emissions of 373 tonnes per annum (23%) is estimated for this second part of the energy hierarchy (see table below).

39 Renewable energy technologies: Air source heat pumps are proposed to provide the space heating and cooling demand for the bedrooms. If air source heat pumps are still proposed for cooling after having addressed the comments above, further information should be provided on the capacity of the air source heat pumps. A reduction in regulated CO₂ emissions of 39 tonnes per annum (3%) is claimed through this third element of the energy hierarchy (see table below).

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. 2010 Building Regulations	1,697		
Energy Efficiency	1,612	85	5%
CHP	1,239	373	23%
Renewable energy	1,200	39	3%
Total		497	29%

40 A total reduction of 497 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is proposed, equivalent to an overall saving of 29%. The CO₂ savings fall short of the targets within policy 5.2 of the London Plan. The applicant should address the comments above and consider additional measures aimed at achieving further reductions.

Flood risk management

41 The application site area is 0.62ha, below the threshold of 1ha. Therefore a flood risk assessment is not required. As the site area is 99% hard surfaced (concrete/tarmac) with limited boundary treatment, it is considered that the scope for SUDS is limited by the extent of site building coverage. The applicant has stated that there are no of any historical ponding issues at the site which is in Flood Zone 1 and wholly within the airport boundary. It drains via Heathrow Airport's own drainage system to their attenuation ponds outside the airport. Furthermore, the applicant has proposed to incorporate rainwater harvesting and measures to use the recycling of grey water efficiently.

42 To summarise, the Council should ensure that the proposed measures in regard to surface water management are secured and compliance with London Plan policy 5.13 conditioned.

Transport for London's comments

43 The proposed vehicular access arrangements to and within the site are considered satisfactory. Clarification is nevertheless required with respect to pedestrian and cycle access which should be segregated from vehicular movement. Such details should be agreed prior to determination.

44 Although there is a minor disparity between the application documents, the provision of 84 parking spaces (one per seven bedrooms), including 8 accessible spaces is acceptable in this location, a car parking management shall therefore be secured. Electric vehicle charging points (EVCPs) should also be provided in line with the London Plan parking standards. In addition to the taxi/coach pick up/drop off point already proposed, coach parking should also be provided for this development in line with London Plan policy 6.13.

45 Although the trip generation assessment has not been undertaken in line with TfL best practice, it is still considered adequate for the purposes of this case. A mode split assessment should nevertheless be undertaken to estimate the number of staff, guests and visitors travelling to and from the site by various modes of transport.

46 The applicant expects that the proposed hotel will be linked to the airport terminals by the frequent 'Hotel Hoppa' coach service which currently serves other hotels in the area and as such there would be minimal impact on the TfL bus network. The applicant should therefore be obligated to use their best endeavours to secure a connection to this service.

47 Sixty cycle parking spaces are proposed which is welcomed. Details of layout and design, including end of journey facilities should be secured by condition in line with London Plan policy 6.9.

48 An audit of the quality of walking routes to local bus stops and to Heathrow Terminal 4 should be undertaken. The audit should identify any necessary improvements to be secured by section 106/278 agreements with Hillingdon Council as appropriate.

49 Whilst the submission of a draft framework travel plan is welcomed, its content should be improved, including the provision a regular connecting services between the hotel and Heathrow Airport; before it is secured in line with London Plan policy 6.3. Similarly, a delivery and servicing plan (DSP), and construction logistics plan (CLP) must also be secured by a planning condition to comply with London Plan policy 6.14.

50 The proposed development is within the London Borough of Hillingdon where the proposed Mayoral CIL charge is £35 per square metre.

51 In summary, TfL requests that the issues raised above be addressed satisfactorily by the applicant ensuring the compliance of the proposals with the London Plan policies.

Local planning authority's position

52 Hillingdon Council's planning officers have yet to confirm their position in regard to the proposed development.

Legal considerations

53 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

54 There are no financial considerations at this stage.

Conclusion

55 London Plan policies on Hotel use, employment, urban design, inclusive design, sustainable development, noise and air quality, flooding, employment and training, transport and parking are relevant to this application. The proposed redevelopment broadly complies with the London Plan. However, there are few issues that must be addressed as set out below:

- **Hotel use:** The proposed redevelopment of the site for hotel use is acceptable in terms of land use, provided concerns in regard to airport navigation system are addressed and secured.
- **Employment and training:** The provision of on-the-job training for young people interested in pursuing a career in the hospitality industry should be secured.
- **Urban design:** The design approach and the facade treatment to the hotel buildings is supported.
- **Inclusive design:** All the proposed measures to incorporate inclusive design should be conditioned. Hotel accessibility management plan should be provided and its submission conditioned.
- **Sustainable development/energy:** The carbon savings of 29% fall short of the targets within policy 5.2 of the London Plan. The applicant should address the comments above and consider the scope for additional measures aimed at achieving further reductions.
- **Noise and air quality:** As the location of the site is within the airport boundary, the proposed mitigation measures should be conditioned.
- **Flooding:** Compliance with policy 5.13 of the London Plan should be conditioned.
- **Transport:** Concerns as detailed in the transport section should be addressed and conditioned.

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