



**Matter 4
Representor DS19 (1)
Savannah Hotels**

**London Borough of Ealing
Local Development
Framework
Development Sites
Development Plan Document**

**Representation on
behalf of Savannah
Hotels**

17th May 2013

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Approved by:
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1.0 INTRODUCTION

1.1 This submission is to be read in conjunction with the representations submitted on 23rd August 2012 in respect of a small area of land north of the A40 and bounded to the south by the LUL/Network Rail cutting, to west by the paved area at the northern end of Mason's Green Lane, and to the north by the boundary with the London Borough of Brent. This land forms part of a larger site extending up to Coronation Road, and subject to outline planning permissions from both Boroughs granted in July 1999 for a comprehensive development of land forming part of the Guinness (now Diageo) ownership, within the masterplan for which the site was identified for an hotel of 150 bedrooms.

1.2 Notwithstanding this planning history, the land continues to be identified as Metropolitan Open Land (MOL), and the representor supported by the landowner, seeks to have the land excluded from MOL on two main grounds:

- That the retention of the land as MOL is inappropriate in the light of adopted policies which include the land within a regeneration area, and
- In any event, the land no longer contributes to the purposes of MOL as set out in the London Plan Policy 7.17

1.3 Since this submission was made in August 2012, there has been substantial progress towards the issue of permissions by both Boroughs for an hotel development on the land south of Coronation Road, and the purposes of this supplementary submission is to update the Inspector on the current position.

2.0 UPDATE

2.1 On 26th October 2012, virtually identical planning applications were submitted to the London Boroughs of Ealing and Brent for an hotel development on the land, the only difference being that the Brent application included land for coach parking a short distance from the main site. The main hotel site straddled the boundary between the boroughs, with the main hotel frontage to Coronation Road (in Brent) and a service road at the rear (in Ealing). The Ealing application has the reference P/2012/4545 and the Brent reference is 12/2861.

2.2 The applications were referred to the Mayor and on 6th February 2013 he issued his Stage 1 response (Appendix A). Land use issues are set out in paras 14 – 20, and it will be seen that officers set out the background, including the applicant's offer to enter into a Unilateral Undertaking with Brent Council to not object to it designating a much larger area of open land it owns to the north as new MOL. GLA officers concluded that very special circumstances exist given the unique circumstances of the site and its planning history, and should the applicant conclude and sign the Unilateral Undertaking, the wider regeneration benefits that would accrue from this development are considered to outweigh the harm that would result. They advised that:

'The potential loss of MOL is therefore considered acceptable in strategic planning terms.'

2.3 On 13th March 2013, the Brent application was reported to the Planning Committee, who resolved to grant consent, subject to referral to the Mayor and a Section 106 agreement, including the proposed terms of the Unilateral Undertaking relating to the MOL to satisfy the GLA.

2.4 On 3rd April 2013, the Ealing application was reported to the Planning Committee, who also resolved to grant in similar terms to Brent. The Committee report is at Appendix B, and the reasoned justification deals with the MOL issues on pages 35/36. The officers concluded that:

'Therefore, in the light of local, regional and national policy, along with the planning history on the site, there is not considered to be any material change in

circumstances over the past 13 years to now warrant refusal on the grounds of principle.'

- 2.5 Both applications have now been passed to the Mayor's office for Stage 2 consideration which is due imminently.

3.0 CONCLUSIONS

- 3.1 Since the date of the representations, the principle of hotel development on the land which the representors are seeking to have removed from MOL has been accepted by the Mayor through the Stage 1 Report and the London Borough of Ealing, and subject to concluding the Section 106 agreement, planning permissions for the development will be in place shortly.
- 3.2 In the circumstances, and given the changes to the wider context as described in the original submission, retention of the site as MOL is not justified in terms of the tests set out in the London Plan at Policy 7.17. However, even if it is judged that this is not the case, the very limited contribution which this particular small site could possibly make to the wider MOL in this area, coupled with the strong likelihood of consent being granted by Ealing for hotel development, possibly before the Examination, do not support retention of the site as MOL.
- 3.3 Accordingly, the Inspector is asked to recommend that the site be **excluded** from MOL.

Appendices

Appendix A – Stage 1 Response from Mayor – 06.02.13

Appendix B – Ealing Committee Report P/2012/4545 – 03.04.13

Appendix A – Stage 1 Response from Mayor – 06.02.13

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GREATER LONDON AUTHORITY
Development & Environment Directorate

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Our ref: PDU/2159a/LF
Your ref: 12/2861
Date: 6 February 2013

For the attention of:

Gary Murphy
Brent Council
Planning Service
4th Floor Brent House
349 High Road
Wembley
LONDON
HA9 6BZ

Dear Gary Murphy,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
Coronation Road, NW10
Local Authority Reference: 12/2861

I refer to the copy of the above planning application, which was received from you on the 9 January 2013. On the 6 February Sir Edward Lister, Chief of Staff and Deputy Mayor, Policy and Planning, acting under delegated authority, considered a report on this proposal, reference PDU/2159a & 2159b/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Chief of Staff and Deputy Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 66 of the above-mentioned report; but that the possible remedies set out in this paragraph could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note however, that the GLA has been consulted on the HS2 further safeguarding proposals which show this site potentially being safeguarded for the construction of the HS2 project. The HS2 project has the potential to bring significant benefits to London, including to Brent and Ealing, and the Mayor supports the HS2 project subject to its regeneration benefits being maximised.

The GLA is therefore currently working with London Boroughs of Brent, Ealing and Hammersmith and Fulham to develop an Opportunity Area Planning Framework (OAPF) for the Park Royal area to ensure these benefits are realised through the creation of new jobs and homes. As part of this process, the GLA will be responding to the further safeguarding proposals and will be asking HS2 to ensure that where safeguarding is proposed, that only the minimum area of land needed is safeguarded. It will also stress that wherever possible, the safeguarding should not adversely impact existing businesses and employers, or the likely creation of new jobs and opportunities (including those around the HS2/Crossrail Interchange).

Finally, please note that the Transport for London case officer for this application is Patricia Charleton, e-mail: PatriciaCharleton@tf.gov.uk, telephone 0207 126 4617.

Yours sincerely,



Colin Wilson

Senior Manager- Planning Decisions

cc Navin Shah and Dr Onkar Sahota, London Assembly Constituency Members
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
Tanya Jordan, CGMS Consulting, 7th Floor, 140 London Wall, London EC2Y 5DN

Land south of Coronation Road, Park Royal, NW10

in the London Boroughs of Ealing and Brent

planning application refs: PP/2012/4545 & 12/2861

Strategic planning application stage 1 referral (new powers)

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 an 11 storey building to provide a 229 bed hotel (Class C1) with ancillary function/event space and conference, bar and dining facilities, together with car parking, cycle parking, servicing, drop-off and coach parking and a retail kiosk (Class A1 or A3).

The applicant

The applicant is **SB Hotels** and the architect is **HKS Hill Glazier Studio**.

Strategic issues

The applications raise issues in respect of land use, urban design, biodiversity, inclusive design, sustainability, water resources and flood risk, energy and transport.

Recommendation

That Ealing and Brent Councils be advised that the applications do not comply with the London Plan for the reasons set out in paragraph 66 of this report; but that the possible remedies set out in this paragraph could address these deficiencies.

Context

1 On the 9 January 2013 the Mayor of London received documents from Ealing and Brent Councils notifying him of two identical planning applications 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 the 19 February 2013 to provide the Councils with a statement setting out whether he considers that the applications comply 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 decisions to make.

2 The applications are referable under Categories 1B (Development outside Central London with a total floorspace of more than 15,000 sq.m.), 1C (Development of a building more than 30 metres high outside the City of London), 3D (Development on land allocated as Green Belt or Metropolitan Open Land in the development plan and which would involve the construction of a building with a floorspace of more than 1,000 square metres), and Category 3E (Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated and comprises or includes the provision of more than 2,500 sq.m. of C1 [Hotel] floorspace), of the Schedule to the Order 2008.

3 Once Ealing and Brent Councils have resolved to determine the applications, they are required to refer them back to the Mayor for his decisions as to whether to direct refusal; take them over for his own determination; or allow the Councils to determine them themselves.

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 site is approximately 0.28 ha and is located to the north of the A40/Western Avenue. It is bounded by the Central Line and a Network Rail line to the south and connected to the A40 by a new link road and roundabout. It is linked to Park Royal station via a pedestrian bridge and underpass. Lakeside Drive is located to the west of the site and Diageo's headquarters' building is located to its north-west. To the north of Coronation Road there is a landscaped park which serves the wider First Central development to the north. The land immediately opposite is proposed for additional offices. The area to the east of this site previously accommodated the Guinness brewery which has now been demolished and is currently undeveloped.

6 The site is located approximately 240 metres to the north of Park Royal Underground Station, providing access to Piccadilly line services. In addition, Hanger Lane station is located around 700 metres to the south west, though like Park Royal station, it is separated from the site by Western Avenue and rail lines. Bus route 226 operates along Coronation Road with stops immediately adjacent to the site itself. Whilst routes 95 and 487 are also within reasonable walking distance, they are accessed via the footbridge and subway to Western Avenue. As such the site records a moderate public transport accessibility level of 3, on a scale from 1 to 6 where 6 is high and 1 is low.

7 The majority of the site falls within the London Borough of Ealing, with the remainder, (the north-eastern segment of the site), falling within Brent. The land within Ealing is formally designated as Metropolitan Open Land. The site is also within land identified by HS2 as potentially needed for safeguarding and forms part of a larger east-west *Green Corridor*, which London Plan policy requires boroughs to identify, protect and enhance to enable species to colonise, re-colonise and move between sites.

Details of the proposal

8 Erection of an 11 storey building to provide a 229 bed hotel (Class C1) with ancillary function/event space and conference, bar and dining facilities, together with car parking, cycle parking, servicing, drop-off and coach parking and a retail kiosk (Class A1 or A3).

Case history

9 The site previously formed part of a larger area of playing fields used by staff working at the former Guinness Brewery. These were designated as Metropolitan Open Land (MOL) in order to protect their amenity and open space value, as were the railway cuttings to the south of the site. However, planning permission was granted in 1999 for the comprehensive redevelopment of the former brewery and its associated facilities to provide offices, a range of industrial units and new open spaces - notwithstanding the MOL designation. This permission included a hotel on the application site; and although this has not been implemented, Ealing Council officers have suggested that as the larger application has been implemented, this extant hotel approval could proceed without further approval. Brent Council officers take a contrary view, as *Approval of Detail* submissions may not have been made within the required timeframe.

10 A pre-planning application meeting was held at City Hall on the 6 September 2012 where concerns were raised in respect of design, inclusive access, transport, and loss of Metropolitan Open Land (MOL).

Strategic planning issues and relevant policies and guidance

11 The relevant issues and corresponding policies are as follows:

- Urban design *London Plan;*
- Mix of uses *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy;*
- Green Belt/MOL *London Plan;*
- Biodiversity *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM);*
- 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;*
- Tourism/leisure *London Plan; Good Practice Guide on Planning for Tourism (DCLG).*

12 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 Ealing Core Strategy, saved policies of the 2004 Ealing Unitary Development Plan, the 2010 Brent Core Strategy, the 2002 Brent Unitary Development Plan, the Brent Site Specific Allocations Development Plan Document, and the 2011 London Plan.

13 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- Ealing Council's July 2012 (Consultation Version) Policies Map, and Brent Council's July 2011 Site Allocations DPD.
- The 2011 Park Royal Opportunity Area Planning Framework.

- The Revised Early Minor Alteration to the London Plan.

Land use

Metropolitan Open Land (MOL)

14 London Plan policy 7.17 (Metropolitan Open Land), confirms the Mayor's strong support for the current extent of MOL and its protection from development that could have an adverse impact on its openness. As set out below, this approach is consistent with the NPPF. The policy further states that the strongest possible protection should be given to London's MOL and also that inappropriate development should be refused except in *very special circumstances*. Paragraph 7.56 of the London Plan opposes development that would lead to the loss of MOL in return for the creation of new open space elsewhere.

15 Paragraph 79 of the National Planning Policy Framework (NPPF) states that the fundamental aim of Green Belt policy, (and by extension MOL policy), is to prevent urban sprawl by keeping land permanently open, (i.e. unbuilt), and that the essential characteristics of such land is its openness and permanence. The NPPF also states, (at paragraph 87), that inappropriate development is by definition harmful to such land and should not be approved except in 'very special circumstances'. It then adds (at paragraph 88), that *very special circumstances* will not exist unless the potential harm, by reason of inappropriateness (or any other harm), is clearly outweighed by other considerations.

16 Metropolitan Open Land boundaries in London are established by local planning authorities (in the case the two boroughs), through their local development plan processes. The section of the site that is within Ealing retains its Metropolitan Open Land status and amounts to some 0.21 hectares. Furthermore, the Council has recently consulted on possible changes to its Development Plan, (specifically its Development Management and Development Sites documents), and proposed no change to this designation.

17 GLA digital maps however indicate that the portion of the site that is within Brent is not currently MOL. Furthermore, this portion of the site is not identified as MOL in Brent Council's 2010 Adopted Proposals Map. It can therefore be reasonably assumed that this part of the application site is no longer designated as Metropolitan Open Land.

18 The applicant contends that the site's remaining MOL designation, (i.e. that section of the site that falls within Ealing) is obsolete, as: a) it does not meet current London Plan criteria, b) because it fails to take into account why it was originally designated as MOL, and c) because planning permission was granted for a hotel on the site in 1999. The applicant has also indicated that it is prepared to enter into a unilateral undertaking with Brent Council to not object to it designating a much larger area of open land it owns to the north of the application site as new Metropolitan Open Land.

19 Two key issues for the acceptability of proposed development are therefore whether it does present such very special circumstances, and whether London Plan policies to protect MOL would be outweighed by other (planning) considerations.

20 GLA officers are of the view that such very special circumstances do exist here given the unique circumstances of the site and its planning history, and should the applicant conclude and sign the unilateral undertaking it has proposed, the wider regeneration benefits that would accrue from this development are considered to outweigh the harm that would result. The potential loss of MOL is therefore considered acceptable in strategic planning terms.

The proposed hotel use

21 London Plan Policy 4.5 seeks to achieve the delivery of 40,000 additional hotel bedrooms by 2031, of which ten per cent should be wheelchair accessible. The policy confirms that beyond the Central Activities Zone, this new accommodation should be focussed in town centres and opportunity and intensification areas where there is good public transport access to central London and international and national transport termini.

22 The site is located within the Park Royal Opportunity Area and can be accessed from Park Royal and Hanger Lane Underground stations. A hotel use would therefore be acceptable in this location and help bring about the regeneration and employment opportunities sought by the Park Royal Opportunity Area Planning Framework.

Urban design

23 The main elements of the hotel design are welcomed. Specifically, the proposed massing comprises a podium, middle/central element and a cap/roof, which would provide a "civic" presence and provide a good response to the scale of the buildings in the wider area. The facade design responds appropriately to this massing, and would create an interesting and striking appearance. At the GLA's pre-application meeting it was suggested that the heavy edge elevation and prominent signage might result in the hotel appearing monolithic in certain views, and hence the detailed design should explore the potential to address this concern. A number of elevational changes have been proposed and material submitted showing how the building would be visible within locally significant views. These are acceptable from a strategic planning perspective.

24 The proposed bulk, scale and appearance of the building are also acceptable in strategic planning terms. The importance of the pedestrian connection to Park Royal Station was also stressed at the GLA's pre-application meeting, and it was strongly suggested that the proposed development should provide tangible improvements to the quality, appearance and safety of this connection. It was also stressed the design of the hotel would also help improve community safety by introducing additional overlooking and provide an attractive active frontage at the lower (plaza) level.

25 As a result, the size of the proposed plaza level retail unit has been increased and a new security office has been incorporated adjacent the plaza. These are welcomed and would satisfactorily address the GLA's concerns over these matters. However, the applicant is not proposing any additional works or funding to improve the pedestrian connection to Park Royal station. This is discussed further below.

Inclusive design

26 At pre-application stage, the applicant was advised that the application should ensure that routes to and from Park Royal and Hanger Lane tube stations would be legible, with clearly identified street level entrances to make access easy, safe and comfortable, particularly for disabled people. The applicant was also advised that there was a major concern with the hotel proposing to use the existing access ramps and staircases from the lower plaza level to the ground floor entrance as these were not ideal for disabled people to use.

27 As a result, the applicant was asked to look again at access arrangements between the plaza level and the hotel, ideally by looking at the possibility of creating a secondary entrance to the hotel so that customers could access at plaza level and avoid the convoluted route up to the higher level entrance.

28 This has been considered by the applicant but rejected, and instead it is proposing that staff in the new security office could assist hotel visitors access the higher level entrance. Whilst this approach could offer some benefits, it is still strongly suggested that a lower level secondary hotel entrance be provided in order to ensure full inclusivity and further increase the attractiveness and safety of the plaza and the key connection to Park Royal station.

29 Finally, it was suggested that some of the proposed disabled parking bays should have a vertical clearance of not less than 2.6 m. to allow for wheelchair hoists, that additional disabled parking bays be provided, that details of the lifts be provided in the design and access statement in terms of size/capacity, and that the applicant considers providing a 'fire evacuation lift' which could be used for emergency evacuation purposes. Finally, it was suggested that the applicant confirm that level access would be provided to any rooftop amenity spaces as well as providing access details to the retail kiosk.

30 These matters have been satisfactorily addressed with the exception of additional disabled parking bays and details of the kiosk's and rooftop accessibility. These matters should be satisfactorily addressed before the applications are referred back to the GLA at Stage 2.

Biodiversity

31 As set out above, the site forms part of a larger east-west *Green Corridor*, which London Plan policy 7.19 (Biodiversity and access to nature), requires boroughs to identify, protect and enhance to enable species to colonise, re-colonise and move between sites. The applicant has recognised the existence of this corridor in its submission and has undertaken an ecological appraisal of the site. This recommended that habitat creation be used to enhance the biodiversity of the site. It also recommended that a *conservation-orientated management plan* be utilised to ensure a long-term commitment to biodiversity. These recommendations should be required by an appropriate planning condition/S106 clause to ensure compliance with relevant London Plan policies.

Sustainability

32 The applicant has prepared and submitted detailed environmental documentation in respect of air quality, ground conditions, noise and vibration. This is welcomed and considered satisfactory from a strategic planning perspective.

Water resources and flood risk

Flood risk

33 The site is within Zone 1 and as such is acceptable in principle.

Surface water run-off

34 The submitted flood risk assessment (FRA) indicates that the new development will result in 95% of the site becoming hard surfaced. Therefore, to avoid increasing the risks of surface water flooding in the surrounding area, it will be important to ensure that the development does not increase discharges to the local sewer network. The FRA therefore proposes to install attenuation tanks and restrict the discharge from the site to Greenfield run-off rates. The FRA also indicates that the building will include an element of green-roof.

35 This approach should be seen as the minimum acceptable approach in order to comply with London Plan sustainable drainage policy (5.13) and should be secured via an appropriate planning condition. The development should also consider whether some of the attenuation could be incorporated into surface landscaping features around the hotel and whether some of the rainwater could be used for non-potable uses within the hotel, thereby reducing mains water consumption.

Energy

Overview

36 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO₂) emissions. Sufficient information has been provided to understand the proposals as a whole, but further revisions and information are required before the proposals can be considered acceptable and the CO₂ savings verified.

BE LEAN

Energy efficiency standards

37 A range of passive design features and demand reduction measures are proposed to reduce the CO₂ 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 lighting controls. The demand for cooling will be minimised through solar control glazing.

38 Based on the information provided, the proposed development does not appear to achieve any CO₂ savings from energy efficiency alone compared to a 2010 Building Regulations compliant development.

39 The applicant should state the savings in regulated CO₂ emissions in tonnes per annum resulting from energy efficiency measures and commit to the development exceeding 2010 Building Regulations compliance through energy efficiency alone.

BE CLEAN

District heating

40 The applicant has identified that a district heating network is proposed within the vicinity of the development as part of the wider masterplan and is proposing to connect to the network. Connection to this network should continue to be prioritised and evidence of correspondence with the network operator should be provided.

41 The applicant is proposing to install a site heat network. However, the applicant should confirm that all rooms and areas of the hotel will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided.

42 The site heat network will be supplied from a single energy centre. The applicant should confirm that this will be located in the basement of the hotel as indicated and also provide the floor area.

Combined Heat and Power (CHP)

43 The applicant is proposing to install a 50kWe gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the 50% of the hot water load. A reduction in regulated CO2 emissions of 206 tonnes per annum will be achieved through this second part of the energy hierarchy, but as set out below, still needs to be verified.

BE GREEN

Renewable energy technologies

44 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 space heating and cooling to the proposed development. The ASHP and CHP are conflicting technologies competing for heat demand within the building. The applicant should confirm that the ASHP will be a centralised unit serving the building via a network and not individual units provided for each room. The applicant should also indicate how the CHP and the ASHP would operate alongside communal heat provision.

45 A reduction in regulated CO2 emissions of 198 tonnes per annum will be achieved through this third element of the energy hierarchy. However, this saving should be confirmed after taking into account the comments regarding a centralised ASHP.

OVERALL CO2 SAVINGS

46 The applicant should calculate the residual CO2 emissions after each stage of the energy hierarchy. It should then complete a table showing CO2 emission reductions from the application of the Mayor's energy hierarchy so that the proposed reduction of tonnes of CO2 per year in regulated emissions compared to a 2010 Building Regulations compliant development can be confirmed.

Transport

47 A total of 90 parking spaces are proposed within the basement and lower ground floor areas, including 20 accessible parking spaces. As the London Plan does not specify a maximum parking ratio for hotels in more moderately accessible areas, the applicant has applied Brent Council 2004 UDP standards. This would result in 46 spaces for the hotel use and 28 spaces for staff. However, a further 11 spaces are proposed for non resident visitors to the food and drink facilities included within the hotel. As this is an out of centre location, remote from other food and drink uses, TfL does not consider that visitor numbers are likely to justify the additional 11 spaces and recommends they are deleted. On that basis, there should be a maximum of 74 spaces.

48 For the level of car parking that is ultimately agreed, 20% of the proposed spaces should be fitted with electric vehicle charging points (EVCPs), along with a further 10% passive provision. The details submitted with the application currently indicate that 18 active and 9 passive spaces will be provided which is welcomed. These EVCPs should be secured by planning condition.

49 24 cycle spaces are proposed, located in either the basement or in a secure enclosure adjacent to the eastern elevation of the building. As the transport assessment estimates that there would be 183 employees, provision is in line with London Plan policy 6.9 and therefore welcomed. The provision of staff showers and lockers on the first floor are also supported.

50 Following TfL initial comments, the applicant has revised the trip generation assessment to remove survey sites with very poor public transport accessibility and delete duplicated data. Whilst this has resulted in an overall increase in trip rates, there would be a reduction in the vehicular mode share and trips. TfL agrees that these proposals would have a minimal impact on traffic levels on the TLRN. As requested, the applicant has also assessed the impact on the public transport network which also shows that there would not be a perceptible impact on the underground network.

51 Although a cumulative impact assessment of the wider masterplan area has not been undertaken, the traffic assessment for the adjacent First Great Central site assumed a 200 bedroom hotel on this site. With those proposals, TfL noted that the traffic impact was not a concern provided that parking restraint; on street parking controls and support for sustainable transport were implemented. As such TfL considers that this reinforces the view that car parking levels should be reduced to the Brent Council maximum.

52 With previous proposals for this site, TfL objected to the extension of the bus layby along with the removal of the bus stand on the south side of Coronation Road. This matter appears to have been addressed in the current proposals which would result in the south side layby being extended, with both stop and stand retained though relocated approximately 19 metres to the east. TfL has considered the proposed highway plan for these alterations and considers that they are reasonable. They should therefore be secured by Brent and Ealing Councils through the section 278 agreement and implemented prior to the operation of the hotel.

53 Further to the agreed trip rates, as stated above, it is likely that hotel trips would occur outside the network peak and as such no further mitigation will be required. TfL notes that £450,000 has already been secured from the wider masterplan proposals towards the provision of an additional bus per hour increase in frequency on route 226.

54 London Plan policy 6.13 advises that one coach parking space should be provided per 50 hotel rooms. TfL therefore expects that coach parking provision should deal with likely demand and prevent coaches standing on Coronation Road, as this could increase traffic congestion and disrupt bus operations. The applicant has confirmed that the proposed coach parking on Lakeside Avenue could accommodate 2 full size coaches or 3 midi coaches. Furthermore, TfL welcomes the applicant's advice that a coach management strategy will be adopted. This should be secured by Brent and Ealing Councils through the section 106 agreement.

55 As the hotel will include conference/function/event space, TfL considers that the demand for taxis may have been underestimated and is therefore disappointed at the lack of specific rank provision for taxis (black cabs) and private hire vehicles (PHVs) to serve the development. The applicant however, does not consider that the overall demand for taxis in the area will be sufficient to ensure that taxis will be prepared to wait on a dedicated facility. It expects that the taxi servicing strategy can be addressed through the wider servicing and management strategy which will be secured through the section 106 agreement. It also advises that the location of the proposed layby will enable passengers to enter/exit vehicles on the nearside thus avoiding any conflict with taxis. Whilst the lack of dedicated taxi rank is regrettable, the proposed arrangement appears reasonable and is therefore accepted.

56 As part of the wider masterplan proposals for the First Great Central site, TfL notes that a contribution of £550,000 has already been secured towards improving pedestrian/cycle links to Park Royal. The identified improvements included the footbridge over the rail lines, Mason's Green Lane and the pedestrian subway under the A40. Whilst, the contribution secured to date could help to deliver works to the pedestrian subway, the level of funding will limit what could be undertaken. TfL therefore requests further section 106 funding to help deliver wider pedestrian improvements, whilst acknowledging that the proposed alignment of High Speed 2 (HS2) could result in the demolition of the Mason's Green Footbridge. TfL therefore welcomes further discussion about this matter.

57 In addition to physical improvements to the footpath, footbridge and subway, the creation of active frontages to this route will increase passive surveillance and reduce the risk and perception of crime along this link. TfL therefore welcomes the provision of a cafe and retail area within the lower ground floor area.

58 In order to manage the impact of servicing trips, TfL welcomes the applicants advice that a service and delivery plan (DSP) will be adopted in line with London Plan policy 6.14 'freight'. The DSP should be secured through the section 106 agreement.

59 TfL also welcomes the submission of an interim workplace travel plan. As with the DSP, it should be secured and monitored through the section 106 agreement.

Community Infrastructure Levy

60 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement the London Plan, particularly policies 6.5 and 8.3. The Mayoral CIL formally came into effect on 1 April 2012, and it will be paid on commencement of most new development in Greater London that was granted planning permission on or after that date. The Mayor's CIL will contribute towards the funding of Crossrail

61 The Mayor has arranged boroughs into three charging bands. The rate for both Brent and Ealing Councils is £35/ sq.m. The required CIL should be confirmed by the applicant and councils once the components of the development or phase thereof have themselves been finalised. See the 2010 regulations: <http://www.legislation.gov.uk/ukdsi/2010/9780111492390/contents> as amended by the 2012 regulations: <http://www.legislation.gov.uk/ukdsi/2012/9780111529270>

62 London borough councils are also able to introduce CIL charges which are payable **in addition** to the Mayor's CIL. Brent Council expect to adopt its CIL scheme on 25 February 2013 whereas Ealing Council has yet to adopted a scheme.

Local planning authority positions

63 These are not known at this stage.

Legal considerations

64 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 authorities with a statement setting out whether he considers that the applications comply with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Councils must consult the Mayor again under Article 5 of the Order if they subsequently resolve to make draft decisions on the application, in order that the Mayor may decide whether to allow the draft decisions to proceed unchanged, or direct the Councils under Article 6 of the Order to refuse the applications, or issue directions under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the applications. There is no obligation at this present stage for the Mayor to indicate his intentions regarding possible directions, and no such decisions should be inferred from the Mayor's statement and comments.

Financial considerations

65 There are no financial considerations at this stage.

Conclusion

66 London Plan policies on land use, urban design, biodiversity, inclusive design, sustainability, water resources and flood risk, energy and transport are relevant to these applications. The applications comply with some of these policies but not with others for the reasons set out below. These changes might however, remedy these deficiencies and could possibly lead to the applications becoming compliant with the London Plan:

- **Land use:** The potential loss of Metropolitan Open Land (MOL) is considered acceptable in the particular circumstances of this case providing the additional area of open space is safeguarded by the applicant in the manner suggested. The proposed hotel use is acceptable.
- **Urban design:** The broad approach to urban design is supported.
- **Biodiversity:** The approach to biodiversity is supported.
- **Inclusive design:** The concerns raised in this report in respect of disabled parking bays, the proposed kiosk and rooftop accessibility should be satisfactorily addressed before the applications are referred back to the GLA at Stage 2.
- **Sustainability:** The proposed approach is welcomed and considered satisfactory from a strategic planning perspective.
- **Water resources and flood risk:** The proposed approach is broadly welcomed subject to further consideration of whether some of the attenuation could be incorporated into surface landscaping features around the hotel and whether some of the rainwater could be used for non-potable uses within the hotel, thereby reducing mains water consumption.
- **Energy:** The matters set out in this report should be satisfactorily addressed before the applications are referred back to the GLA at Stage 2.

- **Transport:** The matters set out in this report should be satisfactorily addressed before the applications are referred back to the GLA at Stage 2.

for further information, contact Planning Decisions Unit:

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Appendix B – Ealing Committee Report P/2012/4545 – 03.04.13

Ref : PP/2012/4545

Address: LAND AT CORONATION ROAD PARK ROYAL NW10

Ward: East Acton

Proposal: Erection of 11 storey building including lower ground floor, with basement to provide 229 bed hotel (Use Class C1) including functions/event space, gym , conference facilities, sales kiosk and plant, 90 car parking spaces on two levels, including 20 disabled spaces, 4 motor cycle spaces, 26 cycle spaces and servicing with vehicular access to the East and frontage lay-by

Drawing numbers: Site Location Plan and Drg HFC-A-L-00-X01 rev04, Drg HFC-A-L-00-001 rev7, Drg HFC-A-L-00-101 rev8, Drg HFC-A-L-00-201,rev8, Drg HFC-A-L-00-301, Drg HFC-A-L-00-401 rev4, Drg HFC-A-L-00-501 rev5, Drg HFC-A-L-00-601 rev4, Drg HFC-A-L-00-701 rev4, Drg HFC-A-L-00-801 rev4, Drg HFC-A-L-00-901 rev5, Drg HFC-A-L-00-1001 rev5, Drg HFC-A-L-00-1101 rev4, HFC-A-L-00-1201 rev 5, Drg HFC-A-L-00-X20 rev04, Drg HFC-A-L-00-X21 rev04, Drg HFC-A-L-00-X22 rev03, Drg HFC-A-L-00-X23 rev04, Drg HFC-A-L-00-X30 rev01, Drg HFC-A-L-00-X31 rev01, Drg 0059-PLI-90-101 revPL00, Drg 111286L11, Drg 111286L07 rev B, Drg 111286D05, Drg HFC-A-L-00-X03, Drg 0059-PL1-90-100 rev PL00

Supporting Documents
 Air Quality Assessment - Oct 2012
 Arboricultural Survey - Oct 2012
 BREEAM pre-assessment - Oct 2012
 HKS-Design & Access Statement - Oct 2012
 Ground Investigation Study - Oct 2012
 Ecological Appraisal - Oct 2012
 Ashmount - Energy & Sustainability Statement - Oct 2012
 Keystone - Flood Risk Assessment & Drainage Strategy - Oct 2012
 Interim Travel Plan (Draft) - Oct 2012
 RBA Acoustics - Noise Survey - Oct 2012
 RBA Acoustics Vibration Assessment - 17 Oct 2012
 CgMS Planning Statement - Oct 2012
 Servicing & Management Strategy (report 2012153/01) - Oct 2012
 URS Transport Assessment Report (47063904) - Oct 2012

Type of Application: Full applications - Majors

Application Received: 26/10/2012

Revised:

Report by: Andrew Vaughan

Executive Summary:

Recommendation: Grant permission subject to any direction by the Mayor of London, a legal agreement undertaken by Brent council to which the London Borough of Ealing would be a signatory, payment of the Mayors CiL (Community Infrastructure Levy), conditions and informatives.

The local planning authority has considered the circumstances of this application for full planning permission against the policies contained in the NPPF (National Planning Policy Framework), The London Plan 2011, the Park Royal Opportunity Area Planning Framework 2011, the policies contained in the Ealing Unitary Development Plan 2004, associated supplementary planning guidance and Ealing's adopted and emerging Local Development Framework.

The proposed hotel is considered to be acceptable in terms of the London Plan's strategic policies and the Council's local planning policies.

Development of the site with a contemporary design is acceptable in principle. The development would not impinge on any identified important views and would be suited to the wider context in terms of proportion and composition and its relationship to adjoining buildings.

Impact on the amenities of existing/neighbouring developments in terms of natural light, privacy and views would be acceptable in compliance with Ealing UDP policy 4.1 'Design of Development'.

Access, transport, traffic and parking and parking arrangements comply with Ealing UDP policy 9.1 'Development Access and Parking', subject to appropriate conditions. The site has "Good" public transport accessibility (PTAL3/4) and the scheme maximises public transport use. The proposed vehicular and pedestrian accesses would be acceptable and the parking provision for both cars and bicycles would meet with UDP and London Plan standards and can be achieved, together with adequate servicing arrangements.

It is considered that the application can be supported, subject to referral to the London Mayor for his Stage 2 response. If the Council decides to make a decision on this application it must consult the Mayor, once again, and give him a period of 14 days within which to allow the draft decision to proceed unchanged, to direct the Council to refuse the application or to issue a direction that he is to act as the Local Planning Authority and proceed to determine the application. Members are therefore asked to delegate the final decision to approve the scheme to the Head of Planning Services provided that the GLA's stage II response does not require any significant changes to the scheme.

This application is a cross-boundary application and an identical planning application was submitted to the London Borough of Brent. This application was considered at the March 13th London Borough of Brent Planning Committee and approved, subject to a completion of a 106 and referral to the Mayor.

Recommendation:

(a) That the committee are minded to grant full planning permission subject to any **direction of the Mayor**. Following the Council's consideration of the application, the application will be referred to the Mayor of London in accordance with Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

AND

(b) and subject to the completion of a satisfactory Section 106 agreement undertaken by the London Borough of Brent of which the London borough of Ealing will be a signatory and/or other form(s) of legal agreement/undertaking in order to secure the s106 matters

NB - Members are advised that the a Section 106 Agreement, which will be undertaken by London Borough of Brent and to which London Borough of Ealing will be a signatory will secure the following benefits:-

- (a) Payment of the Council's legal and other professional costs in (i) preparing and completing the agreement and (ii) monitoring and enforcing its performance.
- (b) A contribution of £10,000 for '10,000 Trees in Park Royal' project.
- (c) A contribution of £79,000 is to be utilised by the Council towards sustainable transportation in the local area, including but not limited to improvements to pedestrian routes to and from the Development.
- (d) Prior to commencement of development submission of a detailed sustainability strategy which shall demonstrate -. (i) How the measures set out in a revised checklist to be submitted, will be implemented to ensure compliance with the Brent, TP6 sustainability checklist ensuring a minimum score of 50% is achieved and (ii) within 3 months of the commencement of development submit a 'BREEAM' interim design stage certificate and indicative assessment to demonstrate the development will achieve BREEAM 'excellent' rating or similar, with compensation should it not be delivered. (iii) Prior to first occupation of the development the Owner shall commission at its own expense an independent BREEAM review by a BRE-approved independent body (the "**Assessor**") with a view to determining whether:
 - (1) 50% "Very Positive" on the London Borough of Brent's Sustainability Development Checklist has been achieved unless an alternative level is agreed in writing by the Council; and
 - (2) the BREEAM Rating of "Excellent" or equivalent has been achieved.
- (e) Prior to the commencement of development, the Owner shall submit to the Council for approval a renewable energy strategy which shall include details of whether and how a 25% improvement on the 2010 Building Regulations Carbon Dioxide Target Emission Rates (TER) could or could not be achieved. Acceptable evidence for which must be submitted before the Material Start and post construction validation of this. Where it is clearly demonstrated that this cannot be achieved on-site, any shortfall may be provided

off-site or through an in-lieu contribution to secure the delivery of carbon dioxide savings elsewhere.

- (f) Implementation of the submitted Interim Travel Plan (draft) dated October 2012..
- (g) Join and adhere to the Considerate Contractors Scheme.
- (h) Prior to first occupation submission and approval of a Service & Delivery Management Plan.
- (i) To demonstrate that upon completion of the approved energy centre on Lakeside Drive, that the proposed development is capable of connection to the district wide heating system.
- (j) Prior to the Material Start enter into a S278 agreement to cover the Highways Works to Coronation Road and Lakeside Drive, including (but not limited to) works along Coronation Road to, involving the extension of the existing bus lay-by approximately 30m eastwards in broad compliance with the indicative layout shown on drg HFC-A-L-00-201,revB (but amended to included a splayed kerb at the eastern end), and the access works to the coach parking area on Lakeside Drive.

At the time of completing this report the applicant is in discussion with the GLA on matters relating to the energy strategy. In theory any future changes to the strategy in order to satisfy the GLA may have an impact on the above Heads of Terms. Members are therefore requested to agree to the principle of the proposed development and the recommendation to approve, and, to delegate authority to the Head of Area Planning, or other duly authorised person, to agree the exact terms of the s106 agreement.

As this is a cross-boundary planning application both Brent and Ealing Council's will be a party to the s106 legal agreement.

And, the following conditions and informatives

Conditions/Reasons:

1. Time Limit 3 years - Full Permission

The development permitted shall be begun before the expiration of three years from the date of this permission.

REASON: In order to comply with the provisions of the Town and Country Planning Act 1990 (as amended).

2. Approved Plans

The hotel development hereby approved shall be carried out in accordance with drawing title numbers and associated documents:

Site Location Plan and Drg HFC-A-L-00-X01 rev04, Drg HFC-A-L-00-001 rev7, Drg HFC-A-L-00-101 rev8, Drg HFC-A-L-00-201,rev8, Drg HFC-A-L-00-301, Drg HFC-A-L-00-401 rev4, Drg HFC-A-L-00-501 rev5, Drg HFC-A-L-00-601 rev4, Drg HFC-A-L-00-701 rev4, Drg HFC-A-L-00-

801 rev4, Drg HFC-A-L-00-901 rev5, Drg HFC-A-L-00-1001 rev5, Drg HFC-A-L-00-1101 rev4, HFC-A-L-00-1201 rev 5, Drg HFC-A-L-00-X20 rev04, Drg HFC-A-L-00-X21 rev04, Drg HFC-A-L-00-X22 rev03, Drg HFC-A-L-00-X23 rev04, Drg HFC-A-L-00-X30 rev01, Drg HFC-A-L-00-X31 rev01

Drg 0059-PLI-90-101 revPL00, Drg 111286L11, Drg 111286L07 rev B, Drg 111286D05, Drg HFC-A-L-00-X03, Drg 0059-PL1-90-100 rev PL00 unless otherwise agreed in writing by the local Planning Authority.

Reason: For the avoidance of doubt, and in the interests of proper planning.

3. Details of External Materials

Prior to the installation of any external materials or finishes to the hotel development hereby permitted, samples and/or details of the materials to be used for the external surfaces of the buildings, together with detailed drawings where appropriate, shall be submitted to and approved in writing by the Local Planning Authority, and this condition shall apply notwithstanding any indications as to these matters which have been given in the application. The development shall be carried out in accordance with the approved details prior to first use/occupation of the buildings.

Reason: To ensure that the materials are appropriate for the development and to safeguard the character and appearance of the conservation area, in accordance with policies 4.1 of the adopted Ealing Unitary Development Plan 'Plan for the Environment' (2004) and policies 7.4 and 7.6 of the London Plan 2011 and policies 1.1 (a) and 1.2 (b) of the adopted Ealing development strategy (2012).

4. Construction Logistics Plan

Prior to the commencement of works on-site a construction and freight management plan shall be submitted to and approved in writing by the local planning authority, and thereafter the development carried out in accordance with the approved details, unless otherwise agreed in writing with the Local Planning Authority.

Reason: In the interests of the amenity of adjoining occupiers and to minimise highway and traffic impact during the course of the works, in accordance with policies 2.6, 4.1, 4.11 and 9.9 of the adopted Ealing Unitary Development Plan 'Plan for the Environment' (2004) and policy 6.3 of the London Plan 2011.

5. Hard and Soft Landscaping Works

The area(s) so designated within the site shall be landscaped in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority within 3 months of the commencement of development, the landscape work to be completed during the first available planting season following completion of the development hereby approved. Any planting that is part of the approved scheme that within a period of five years after planting is removed, dies or becomes seriously damaged or diseased, shall be replaced in the next planting season and all planting shall be replaced in the same positions with others of a similar size and species,

unless the Local Planning Authority first gives written consent to any variation. Such a scheme shall include;-

- (i) areas of hard landscape works including details of location, materials and finishes. These shall have a permeable construction;
- (ii) details of proposed boundary treatments including screening, walls and fencing, indicating materials and dimensions;
- (iii) details of all planting including location, species, size, density and number including tree planting incorporated for the frontage;
- (iv) details of the green sedum roof to be implemented on the roof including a cross section showing the depth of the soil and details of all planting including location, species, size, density and number
- (v) a detailed (minimum 5-year) landscape-management plan showing requirements for the ongoing maintenance of hard and soft landscaping.

Reason: To ensure that the site is landscaped in the interests of the visual character and appearance of the area, in accordance with policies 3.2 and 4.5 of Ealing's adopted Unitary Development Plan 'Plan for the Environment' (2004) and policy 1.1 (i) of the adopted Ealing development strategy (2012).

6. Rating Noise

The rating noise level emitted from any proposed external plant and machinery on any part of the hotel development, as assessed under BS4142: 1997, shall be lower than the existing background noise level by at least 5 dBA as measured at 3.5 m from the nearest ground floor sensitive facade and 1m from upper floor noise sensitive facades, during the relevant periods of operation.

Reason: To safeguard the working conditions of adjoining occupiers, including occupiers of the proposed offices, against noise disturbance, in accordance with policy 4.11 of the Council's adopted Unitary Development Plan 'Plan for the Environment' (2004) and Supplementary Planning Guidance Note 10: Noise and Vibration, adopted London Plan policy 7.15 and policy 1.1 (j) of the adopted Ealing development strategy (2012).

7. Accessibility

The hotel development hereby approved shall be fully accessible for people with disabilities, in accordance with the Council's standards as set out in SPG7 Accessible Ealing. These measures shall include internal layout, door widths and level access to the building and shall be in place prior to the occupation of any part of the development hereby approved and shall be retained thereafter.

Reason: To ensure adequate provision for people with disabilities, in accordance with policy 4.3 of the Council's adopted Unitary Development Plan 'Plan for the Environment' (2004),

policy 7.2 of the adopted London Plan and policy 1.1 (h) of the adopted Ealing Unitary Development Plan (2012).

8. Service Areas Retained

The areas shown as parking, access, loading, unloading and manoeuvring areas for the hotel development shall be kept clear at all times and used for these purposes only.

REASON: To ensure that adequate parking and servicing space is available within the site and maintaining adequate servicing capability for adjacent uses in accordance with policies 4.1, 9.1, 9.9 and 9.10 of the adopted Ealing Unitary Development Plan 'Plan for the Environment' (2004), and policies 6.3, 6.11, 6.12 and 6.14 of The London Plan (2011) and policy 1.1 (f) of the adopted Ealing Development strategy (2012).

9. Electric vehicle charging points

No less than 20% of all parking spaces shall be fitted with electric vehicle charging points (ECVP's), and not less than 10% passive provision. Such spaces shall be provided prior to commencement of the use hereby approved and fully maintained thereafter.

Reason: To ensure sustainable development and to comply with policy 6.13 of the London Plan (July 2011) and policy 1.2 (k) of the adopted Ealing development strategy (2012).

10. No Further Plant

Notwithstanding the plant area proposed at Level 3/First Floor and the roof plant on Level 12 no further plant equipment or machinery shall be fixed to the building externally without the further written consent of the Local Planning Authority.

Reason: To ensure that such further structure(s) do not prejudice the amenity of the neighbouring occupiers or the appearance of the development in the interests of the visual amenities of the locality, in accordance with policy 4.1 and 4.11 of the Council's adopted Unitary Development 'Plan for the Environment' (2004) and SPG10 'Noise and Vibration'; and policy 7.15 of the adopted London Plan (2011) and policy 1.1 (h) and 1.1 (j) of the adopted Ealing Development Strategy (2012).

11. Flood Risk

The development shall be carried out in accordance with Flood Risk Assessment & Drainage Strategy, dated 2 October 2012, unless otherwise agreed in writing by the Local Planning Authority.

Reason; To minimise the risk of flooding, in accordance with policies 5.12 and 5.13 of the adopted London Plan (2011), policy 2.5 of the adopted Ealing Unitary Development Plan (2004) and policy 1.2 (m) of the adopted Ealing Development Strategy (2012).

12. Car Parking

(a) All parking spaces (including cycle parking), turning areas, loading bays, access roads and footways shall be constructed and permanently marked out prior to commencement of use of any part of the approved development approved by the Local Planning Authority.

(b) The dedicated coach parking situated on Lakeside Drive (entirely within the London Borough of Brent) shall be made available prior to first occupation of the building, and thereafter used only by coaches associated with the hotel use, and shall be permanently maintained for the lifetime of the development unless otherwise agreed in writing with the Local Planning Authority.

Reason: To ensure that the proposed development does not prejudice the free flow of traffic or the conditions of general safety within the site and along the neighbouring highway, in accordance with policies 4.3, 9.1 and 9.9 of the adopted Unitary Development Plan 'Plan for the Environment' (2004) and policy 6.3 of the London Plan 2011 and policy 1.1 (f) of the adopted Ealing Development strategy (2012).

13. Refuse and Recycling Storage

The refuse and recycling storage identified on the approved plans shall be provided prior to first use of the development hereby approved, and shall thereafter be retained in operation for this purpose for the life of the development unless otherwise agreed in writing by The Local Planning Authority.

Reason: To ensure the provision of satisfactory facilities for the storage of refuse and recycling, in accordance with policies 2.10 and 4.1 of the adopted Ealing Unitary Development Plan 'Plan for the Environment' (2004) and Supplementary Planning Guidance 4 'Refuse Storage'.

14. Noise attenuation

All guest bedrooms shall be designed in accordance with BS8233:1999 'Sound insulation and noise reduction for buildings - Code of Practice' to attain the following internal noise levels:

Living rooms - 30dB (day: T=16 hours 07.00 - 23.00)

Bedrooms - 30dB (night T= 8 hours 23.00 - 07.00) LAmax 45dB (night 23.00 - 07.00)

A post-completion test shall be carried out prior to the discharge of this condition to show that the standard of sound insulation required shall be met and the results submitted to the Local Planning Authority for approval. In the event that the results show that the above standards cannot be achieved, details of further mitigation measures shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excessive noise from environmental and transportation sources, in accordance with policy 4.11 of the Council's adopted Unitary Development 'Plan for the Environment' (2004) and SPG10 'Noise and Vibration'; and policy 7.15 of the adopted London Plan (2011) and policy 1.1 (j) of the adopted Ealing development strategy (2012).

15. Biodiversity

Prior to the commencement of works on site further details of a biodiversity conservation management plan, setting out a long-term commitment to maintaining and promoting the biodiversity of the site, shall be submitted to and approved in writing by the local planning authority. The approved management plan shall be permanently maintained thereafter.

Reason: To ensure a satisfactory standard of development and protect biodiversity, in accordance with Policy 7.19 of The London Plan (2011) and policy 1..1 (J) of the adopted Ealing Development strategy (2012).

16. Drainage Strategy

Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed".

Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community, in accordance with policies 9.1 'Development, Access and Parking' of the Ealing Unitary Development Plan 2004 and policies 5.12, 5.13 and 5.14 of The London Plan (2011) and policy 1.2 (m) of the adopted Ealing Development strategy (2012).

17. Accessibility

Notwithstanding the approved drawings further detailed drawings shall be submitted, prior to first occupation, demonstrating level accessibility is to be provided for users of the retail kiosk (lower plaza level) and the rooftop terraces/outdoor spaces.

Reason; To ensure the building is suitably designed for wheelchair users, in accordance with policy 4.3 of the Council's adopted Unitary Development Plan 'Plan for the Environment' (2004), policy 7.2 of the adopted London Plan and policy 1.1 (h) of the adopted Ealing development strategy (2012).

Informatives

The decision to grant planning permission has been taken having regard to the policies and proposals in the Adopted Ealing Unitary Development Plan (2004), , The London Plan (2011) and to all relevant material considerations including Supplementary Planning Guidance:

National Planning Policy Framework

The London Plan - July 2011

Policy 2.6 Outer London: vision and strategy

Policy 2.7 Outer London: economy

Policy 2.8 Outer London: transport

Policy 2.13 Opportunity Areas and Intensification Areas
Policy 2.16 Strategic outer London development centres
Policy 2.17 Strategic industrial locations
Policy 2.18 Green infrastructure: the network of open and green spaces
Policy 4.5 - London's Visitor Infrastructure
Policy 5.1 - Climate Change and Mitigation
Policy 5.2 - Minimising Carbon Dioxide Emissions
Policy 5.3 - Sustainable Design and Construction
Policy 5.6 - Decentralised Energy in Development Proposals
Policy 5.7 - Renewable Energy
Policy 5.9 - Overheating and Cooling
Policy 5.10 - Urban Greening
Policy 5.11 - Green Roofs and Development Site Environs
Policy 5.12 - Flood risk management
Policy 5.13 - Sustainable drainage
Policy 5.14 - Water quality and wastewater infrastructure
Policy 5.15 - Water use and supplies
Policy 5.18 - Construction, excavation and demolition waste
Policy 5.21 – Contaminated Land
Policy 6.1 - Integrating Transport and Development (Strategic Approach)
Policy 6.3 - Assessing Effects of Development on Transport Capacity
Policy 6.5 - Funding Crossrail and other strategically important transport infrastructure
Policy 6.7 - Better Street and Surface Transport
Policy 6.9 - Cycling
Policy 6.10 - Walking
Policy 6.11 - Smoothing Traffic Flow and Tackling Congestion
Policy 6.13 - Parking
Policy 7.1 – Building London's neighbourhoods and Communities
Policy 7.2 - An Inclusive Environment
Policy 7.3 - Designing Out Crime
Policy 7.4 - Local Character
Policy 7.5 - Public Realm
Policy 7.6 - Architecture
Policy 7.7 - Tall and Large Scale Buildings
Policy 7.13 Safety, security and resilience to emergency
Policy 7.14 - Improving Air Quality
Policy 7.15 Reducing noise and enhancing soundscapes
Policy 7.18 - Protecting Local Open Space and Addressing Deficiency
Policy 7.19 - Biodiversity and Access to Nature
Policy 7.21 - Trees and woodlands

Policy 8.2 Planning obligations
Policy 8.3 Community infrastructure levy

GLA Supplementary Planning Guidance

Sustainable Design and Construction

Accessible London: Achieving an Inclusive Environment
The Mayor's Transport Strategy
The Mayor's Biodiversity Strategy
The Mayor's Energy Strategy

Relevant Local Planning Policies (Saved)

Unitary Development Plan 'Plan for the Environment 2004':

Chapter 1 - Strategy

1.10 Legal Agreements/Planning Obligations

Chapter 2 - Environmental Resource and Waste

2.1 Environmental and Other Sustainability Impacts
2.5 Water - Drainage, Flood Prevention and Environment
2.6 Air Pollution and Quality
2.7 Contaminated Land
2.9 Energy
2.10 Waste Minimisation and Management

Chapter 3 - Green Space and the Natural Environment

3.1 Major Open Areas - Metropolitan Open Land and Green Belt
3.2 Green Corridors and the Waterway Network
3.8 Biodiversity and Nature Conservation

Chapter 4 - Urban Design

4.1 Design of Developments
4.3 Inclusive Design - Access for All
4.4 Community Safety
4.5 Landscaping, Tree Protection and Planting
4.10 Commercial Frontages and Advertising Signs
4.11 Noise and Vibration
4.12 Light Pollution

Chapter 6 - Business

6.7 Hotel Development

Chapter 9 - Transport

9.1 Development, Access and Parking
9.7 Accessible Transport
9.9 Highways and Traffic Management

Transport Appendix

Sites and Areas

- 10.2 Green Belt and Metropolitan Open Land
- 10.3 Green Corridors
- 10.7 Nature Conservation Sites and Management Areas
- 10.14 Major Employment Locations
- 10.18 Zones for Parking Standards (Zone 1)
- 10.20 Road Hierarchy (Strategic Road - A40)

Ealing UDP Supplementary Planning Guidance/Documents

- SPG 1: Sustainability Checklist
- SPG 2: Water, Drainage and Flooding (draft)
- SPG 3: Air Quality (draft)
- SPG 4: Refuse and Recycling
- SPG 5: Urban Design Statements
- SPG 6: Plot Ratio
- SPG 7: Accessible Ealing
- SPG 8: Safer Ealing
- SPG 9: Trees
- SPG 10: Noise and Vibration
- SPG 20: Transport Assessments
- SPG 21: Green Travel Plans

Development (Core) Strategy (2012)

- Policy 1.1 - Spatial Vision for Ealing 2026
- Policy 1.2 - Delivery of the Vision for Ealing 2026 (1.2(f), 1.2(h), 1.2(k), 1.2(m))
- Policy 3.1 Realising the potential of the A40 Corridor & Park Royal
- Policy 3.3 Promote Business & Industry in Park Royal
- Policy 5.2 Protect and Enhance Metropolitan Open Land (MOL)
- Policy 5.3 Protect & Enhance Green Corridors
- Policy 6.4 Planning Obligations and Legal Agreements

Development Management Development Plan Document, with Minor changes Published February 2013

4A Employment Uses

- Ealing Local variation to Policy 4.5 London's Visitor Infrastructure
- Ealing Local variation to Policy 5.2 Minimising Carbon Dioxide Emissions
- Ealing Local variation to Policy 5.10 Urban Greening
- Ealing Local variation to Policy 5.11 Green Roofs and Development Site Environs
- Ealing Local variation to Policy 5.12 Flood Risk Management
- Ealing Local variation to Policy 5.21 Contaminated Land
- Ealing Local variation to Policy 6.13 Parking

7A Operational Amenity

Ealing Local variation to Policy 7.3 Designing out Crime

Ealing Local variation to Policy 7.4 Local Character

7B Design Amenity

Ealing Local variation to Policy 7.7 Location and Design of Tall and Large Buildings

7D Open Space

Park Royal Opportunity Area Planning Framework (Adopted January 2011)

The Opportunity Area Planning Framework comprises a non-statutory planning document setting out a vision for Park Royal issued by the Mayor of London. This framework is derived from and consistent with the London Plan. The thrust of the framework is that industrial and manufacturing sectors should continue to function and grow in Park Royal as an integral part of London's economy.

In reaching this decision it was considered that the proposed uses are compatible with the site and acceptable in principle. It was judged that the proposal would not impact on the living or working conditions of adjoining occupiers. Furthermore, subject to financial contributions towards highways improvements, the proposal would not compromise the safe and effective operation of the local highway network. Consequently, the proposed development is considered acceptable, as it would comply with the UDP, Development strategy and London Plan Policies and guidelines. There are no other material considerations, which would warrant refusal of the application.

2. Construction and demolition works, audible beyond the boundary of the site shall only be carried on between the hours of 0800 - 1800hrs Mondays to Fridays and 0800 - 1300hrs on Saturdays and at no other times, including Sundays and Bank Holidays.

3. This permission is subject to a planning obligation agreement under section 106 of the Town and Country Planning Act 1990.

4. You should consult the Council's Parks and Countryside Department, Directorate of Environmental Services, Perceval House, 14-16 Uxbridge Road, London W5 2HL regarding the removal of any street trees.

5. You should consult the Council's Transport Development Section and Transport For London regarding alterations to the public highway and condition that will necessitate an agreement with the London Borough of Brnet/Ealing/Transport for London under section 278 of the Highways Act.

6. You are advised that express consent may be required under the Town and Country Planning (Control of Advertisements) Regulation 2007 for the display of advertising signs at the site.

7. The Environment Agency advises the applicant that drainage to soakaway from car parking areas for >50 spaces should be passed through an oil interceptor before discharging to ground. The Environmental Permitting Regulations make it an offence to cause or knowingly

permit any discharge that will result in the input of pollutants to groundwater.

8. Thames Water has provided the following advice:

Waste Comments

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 8507 4321.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet, 'Best Management Practices for Catering Establishments' which can be requested by telephoning 01923 898 188

Water Comments

No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

Supplementary Comments

Running through the development there are easements and way leaves. These are Thames Water Assets and these will not be affected by the proposed development. On the Map a dashed yellow line shows easements and ways. Thames Water request that an impact study is undertaken to determine the impact the development flows will have. Please contact Thames water developer Services on 0845 850 2777.

9. The London Fire and Emergency Planning Authority has provided the following advice:

The applicant is advised to ensure that the plans conform to part B of Approved Document of the Building Regulations and that the application is submitted to Building Control who in some circumstances may be obliged to consult the Fire Authority.

10. To assist applicants in a positive manner, the Local Planning Authority has produced policies and written guidance, and offers and encourages a comprehensive pre-application advice service, all of which is available on the Council's website and outlined in a 24 hours automated telephone system.

The scheme complied with policy and guidance. The Local Planning Authority delivered the decision proactively in accordance with requirements of the National Planning Policy Framework

Site Description:

The development site is located to the north of the A40 (Western Avenue) and the Central Line (Underground) railway line. The site is connected to the A40 by the newly constructed overpass link road and roundabout to the southwest off Coronation Road.

The site borders Coronation Road to the north and a pedestrian and cycle footpath link to the west and Masons Green Lane to the south. Mason Green Lane allows pedestrian access from Park Royal Underground station north directly past the application site into the wider First Central site under and across Coronation Road.

The site, as indicated, is 0.28ha and currently grassed over with perimeter fencing. The topography of the site is such that the ground level rises by 3m from the corner with Masons Green Lane to the north at Coronation Road. There are no residential properties in close proximity to the site.

The site is identified in the Unitary Development Plan (UDP) proposals map as a Green Corridor based on Western Avenue Network Rail/Central Line/Piccadilly Line and Metropolitan Open Land (MOL).

The site is not designated within Ealing's UDP as part of the wider Major Employment Location that covers an extensive area of Park Royal.

The Adopted London Plan (2011) designates Park Royal as an opportunity Area (Policy 2.13), a strategic Outer London Development Centre for industry/greater enterprise (Policy 2.16), and a Preferred Industrial Location under Policy 2.17 (Strategic Industrial Locations).

The Proposal:

Erection of 11 storey building including lower ground floor, with basement to provide a 229 bed hotel (Use Class C1) including functions/event space, gym, conference facilities, sales kiosk and plant, 90 car parking spaces on two levels (including 20 disabled spaces) 4 motor cycle spaces, 26 cycle spaces and servicing with vehicular access to the East and frontage lay-by.

The 229 bedroom hotel would be 4 star and has a Gross External Area (GEA) of 15,730 sq metres and Gross Internal Area (GIA) of 14,850 sq metres and would provide a reception, lounge, bar and restaurant facility. The principal entrance to the building is from Coronation Road which leads directly to the main reception desk. A single central core including passenger lifts provides access to the upper guest room floors.

Of the 229 guestrooms, 26 would be suites and 23 would be wheelchair accessible. The bedrooms are located on the upper floors of the building.

A separate function/event space would be provided at the Coronation Road level and would be capable of seating approximately 225 people. In addition to supporting the conference and business functions of the hotel, it would also be available for public hire. The hotel contains a business suite consisting of a variety of boardrooms and meeting rooms at first-floor level. It is estimated that 183 jobs would be generated from this development.

The build is orientated in a east-west axis parallel to Coronation Road and is articulated as two primary elements – a plinth and a tower. The plinth (2/3 storeys) would contain the public functions – entrance, reception, lounge, bar and restaurant. The tower would contain the guest rooms.

An existing Piazza is provided to the west of the hotel as part of the wider First Central masterplan, accessed via Masons Green Lane and one storey below Coronation Road, A car-park security office (which would be permanently manned) would be located on this frontage, together with a small retail kiosk (38 sq metres GIA).

A total of 90 parking spaces would be provided (including 20 to a disabled standard). Additionally 20 spaces are provided with electric car recharging facilities, located within the basement and lower ground levels. Provision for secure cycle storage for staff, guests and visitors is made, with 24 spaces provided.

Two principal vehicle access points for arriving/departing guests are proposed – a set down at entrance level on Coronation Road and a secure car park at basement levels. Coaches would not wait in the new drop-off on Coronation road and the application includes a separate coach parking area (for 2 coaches) on Lakeside Drive East (This area is entirely within the London Borough of Brent). This coach parking area would be managed by the hotel. A single service access road is included at the eastern end of the building, accessed from the new car park access road. The development incorporates access across the site (where none currently exists) and the hotel would be serviced via the new access road.

The roof of the function suite would be landscaped and external landscaped areas would be created.

NB – An identical planning application was submitted and approved by the London Borough of Brent, subject to referral to the mayor and completion of a 106 agreement. Due to the coach-parking area, the majority of the site area lies within the London Borough of Brent. Brent Council Planning Committee Resolved to support the application, subject to Stage 2 referral and completion of a legal agreement at their Wednesday 13th March Planning Committee. It is considered that the conditions imposed on this application should reflect those imposed by the London Borough of Brent. Energy and sustainability requirements would be ensured through the completion of a 106 agreement, which would be undertaken by the London Borough of Brent and to which the London Borough of Ealing would be a signatory. The terms of the 106 are expressed above.

Relevant Planning History

Application Number	Development description	Decision	Decision Date
03859/4	Full application for new access road from a40 and outline application for mixed use development on 22.18 hectare site including 116,100 sq. Metres offices; sixty-one residential units; underground station including ancillary retail; restaurants; 150 bed hotel; indoor leisure facilities and open space; and associated access, servicing, landscaping and car parking including demolition of existing brewery and leisure buildings.	Granted conditionally	26-01-1998
03859/4/D	Variation of condition 2 to permit combination of phases 1 and 2 of development.	Granted unconditionally	02-12-1999
03859/4/F	Details of archaeological investigation.	Granted unconditionally	15-02-2000
03859/4/G	Details of nature conservation management plan and enhancement pursuant to conditions 6 and 30.	Granted unconditionally	15-02-2000
03859/4/H	Details of contaminated land survey pursuant to condition 26.	Granted unconditionally	15-02-2000
03859/4/I	Details of surface water and sewage disposal pursuant to condition 29.	Granted	15-02-2000

03859/4/J	Details of preliminary air quality assessment pursuant to condition 33.	unconditionally Granted	15-02-2000
03859/4/K	Reserved matters pursuant to condition 1(b) (in part) in respect of landscaped open space on south side of twyford abbey road. (consultation from london borough of brent)	unconditionally No objection raised	20-12-2002
03859/4/L	Reserved matters in respect of size, siting, design and external appearance, and landscaping, for new lul central line underground station pursuant to condition 1a.	Granted conditionally	21-10-2004
P/2003/4071	Reserved matters in respect of the size, siting, design and external appearance and landscaping, for new lul central line underground station pursuant to condition 1a of planning permission ref: 03859/4 granted on 15th july 1999 for provision of new access road from a40 and mixed use development on 22.18 hectare site to provide 116,100sq metres offices (use class b1), 61 residential units, underground station, including ancillary retail, 150 bed hotel, indoor leisure facilities and open space, associated access, landscaping and car parking including demolition of existing brewery and leisure buildings	Granted conditionally	21-10-2004

Consultation:

Public Consultation - Summary

Public

Neighbour notification: 50 neighbouring occupiers and the local Ward Councillors were consulted on the original application and by Press and site notices on 05/12/2012.

Consultation Period Expired 26/12/2012.

- No representations were received.

Internal Transport Comments

Car parking provision

The car parking provision is at a ratio of 1 per 2.5 beds. The site is situated within car parking standards zone 1 of Ealing and therefore the maximum parking standards for both Brent and Ealing Councils are 1 per 5 beds which would give a total maximum provision of 46 car parking spaces 20 of which should be disabled. The car parking justification within the transport assessment states that the parking zone of the site is unlike other parking zones and should therefore be in parking zone 2, even though there are a number of other areas which are in the same parking zone with a similar if not worse PTAL, the zones are not strictly based upon PTAL levels but are based upon areas of high employment. Transport therefore consider the parking zone to be accurate. Furthermore the parking levels are also justified by including ancillary uses, most hotels provide some form of A3/A5 use and therefore this cannot be considered ancillary. It is also not uncommon for Hotels to have

some form of conference facility and the trip generation figures don't appear to take any of these use classes into consideration. It is therefore considered that Ealing's maximum parking standard is appropriate. Brent's maximum parking is similar but also includes the number of staff. It is unclear how 75% of the 188 full time equivalent employees are likely to be on site at any one time for a hotel open 24/7 and evidence of this assumption would be required for an Ealing policy. A nearing doubling of the maximum parking standards for Ealing has therefore not been justified.

Car & Cycle Parking Quality

Not all car parking spaces meet the 6m minimum distance between obstructions a requirement under Manual for Streets, parking spaces 45, 46 & 47 on Level 0 & 39, 40 & 41 on level 1 all have about a 5m clearance.

The disabled parking needs to be closer to the lifts than any other car parking space.

The recommended slope for cyclists using ramps is 1:12 although 1:10 may be acceptable for short distances. However most of the ramp accessing the basement car parking and cycle parking is 1:6 which would be difficult for cars let alone bicycles. Design Recommendations for Multi-storey and Underground Car Parks by the Institution of Structural Engineers (2002) states that gradients of 1:6 are only applicable were the rise is less than 1.5m, if the rise is over 1.5m it should be no less than 1:10. The headroom for Level 0 car park needs to be greater than 1.5m therefore 1:6 is too steep.

Both the basement and surface cycle parking are located at the furthest point from the entrance and is therefore contrary to policy 9.6 (iv) Whilst the basement also needs to be in secure lockable compound in which the public don't have access to. The submitted Travel Plan states that staff who cycle in would have access to a shower, however the first floor plan, where the staff locker rooms are depicted, doesn't indicate where showers are, whilst this would be the most convenient place to have some.

The shared cycle path to the south of the site is welcomed however, at this width, it should not be segregated and there is a pinch point where it meets the existing cycle/pedestrian paths.

Transport Assessment

2.3.8 The bus layby is currently situated close to the entrance of the

pedestrian route to Park Royal Station and the underpass of Coronation Road, the proposed re-positioning of the bus stop would mean this link is less convenient and would be sited less convenient for the hotel itself, furthermore the re location of the bus stop towards the rear of the lay by closer to the exit arm of the roundabout could pose a road safety hazard and inconvenience to bus users.

The trip generation figures are a fusion of Travl methodology and Trics methodology without any justification. Full Travl trip rates will need to be provided to enable a comparison. It is considered that for a 229 bedroom hotel in which there would also be a number of staff movements there will only be 166 departures from 7am until 11pm. This would be a low figure if only 1 person occupied each room whereby it is likely that the average whilst fully occupied would be greater than 1.

Transport would expect the inclusion of local junction and public transport loadings data to be included within the TA to gauge the affects of the proposal on the transport network.

Travel Plan

The Travel Plan only has baseline data and targets for staff with no targets or baseline data for visitors. Considering visitors would be the largest trip generator of the site it is essential that these are fully included within the travel plan. The baseline data needs to be based upon agreed TA trip generation figures and targets set accordingly and include both visitors and staff.

The monitoring would need to be done through a Travl accredited independent field company at the developers expense. It would need to be carried out in years 1, 3 and 5 and if targets have still not been met to start anew.

Applicant's Response: The applicants transport consultants URS have filed a full response to these comments, which is expressed below:

Response to Highway Comments of Ealing Council Car Parking Provision

*The response to the Transport Assessment Report (TAR) appears to criticise the inclusion of parking related to ancillary uses in the calculation of an acceptable overall provision on the basis that most hotels provide some form of A3/A5 use. This appears contrary to the advice in the notes on the Table of Parking Requirements which can be found on page 139 of the Adopted UDP (**Ealing's New Plan for the Environment**),*

C1: Hotels, Guest Houses and Boarding Houses

This covers accommodation for tourists and business visitors.

For the purpose of this standard, 'beds' includes single and double beds.

Parking spaces are required for the actual number of bedrooms, whether they are single, double or family bedrooms.

Any ancillary or associated uses open to the public, such as restaurant/bar, ballroom, conference hall or educational facilities, will be expected to comply with the relevant non-residential standards, in addition to the parking requirement for the residential element.

The maximum provision of 46 spaces set out in the Council's comments is clearly incorrect as it is based solely on the number of bedrooms and does not follow the advice in the UDP. As stated in the TAR the maximum provision in Zone 1 is 65 spaces and in Zone 2 it is 96 spaces.

We do not follow the logic that the level of employment in an area is a determining factor in the appropriate level of parking. We believe that the PTAL level is a more relevant measure. The Council's observation is contrary to a statement made on page 122 of the Adopted UDP which is set out below and with the most relevant part underlined,

"Appendix One refers to two parking zones. Zone One is the four town centre areas of the borough (Ealing Broadway/West Ealing, Acton, Southall, Greenford Broadway), an area north west of Greenford station, an area north west of Hanger Lane station, an area east of Park Royal station, and a large part of Park Royal (as defined on map sheet 12). These are areas where access to public transport is or should be the best in the borough. Hence the maximum parking requirement is lower than elsewhere in the borough for retail, business, industry and warehousing. Zone Two is the remainder of the borough."

We consider that the above quote supports our position that it would be more appropriate for this location to be in Zone 2. LB Brent has taken the opposite view to LB Ealing in that it increases the maximum parking standard in Park Royal (Parking Standard PS3).

At the time that the UDP was being prepared and then adopted there was the expectation that there would be a new station on the London Underground Central line at Park Royal that would have improved the accessibility of this part of the Borough. However the requirement for the developer of First Central to provide the station is no longer valid.

In determining the parking provision that would be justified by the element of the LB Brent standard that relates to employees, URS has estimated that the maximum number of employees that could be on site at any one time could be up to 75% of the predicted total number of employees. This level has been questioned by LB Ealing. The maximum level is likely to occur around a shift change. Because those starting a shift will arrive before those that they are replacing have left, the parking provision needs to cater for both shifts. The number of employees on site overnight will be very low and there will be a reduced level over the weekend, so that although the hotel will operate 24/7 it is not considered that this proportion is unrealistic. In any event the policy does not

specify that the standard has to be applied to the maximum employees on site at any one time. The wording of that part of Brent's standard is "maximum of 1 space per 5 employees" therefore it would have been reasonable to apply this rate to the total number of employees which would have resulted in 36 spaces being identified rather than the 28 spaces that were reported in the TAR. LB Brent has not been critical of our use of its standard and in the recommendations included in its formal response there is no suggestion that there should be any reduction in the number of parking spaces.

In the GLA Stage 1 report, TfL observed that car parking levels should be reduced to the Brent Council maximum. The proposed level of parking is approximately three quarters of the number of spaces that could be justified on the basis of LB Brent's parking standards based on the combined application of parking standards PS11(Hotels (Use Class C1)), PS9 (Food and Drink Uses (Use Class A3)), and PS3 (Regeneration Exception). Furthermore within the proposed parking provision there is an 'overprovision' of spaces for disabled drivers.

It should be noted that the number of designated disabled spaces falls below the minimum provision required by Ealing's standard. On the basis that guests have to register a request for a parking space at the time of booking a room, the hotel operator will know in advance if demand for disabled spaces exceeds the number of designated spaces and the procedure set out in paragraph 7.1.5 of the TAR would be put in place.

The comments regarding the parking provision contain two incorrect statements that give a negative impression of the proposed parking within the proposed hotel. The maximum provision stated by the Council ignores the ancillary uses which are quite clearly intended to be included in any calculation. In response to the argument by URS that this area does not comply with the description of how areas were chosen to fall within Zone 1, the Council has put forward an argument that is at odds with its own UDP.

The proposed provision complies fully with the standards set by LB Brent. The total provision is above the level that is the maximum for a site in Zone 1 within Ealing but would be below the maximum that would be allowed were the hotel to be treated as if it was in an area which formed part of Zone 2, which we consider to be the correct approach.

Transport Assessment

Layout of Bus Layby

The comment is made that the repositioning of the bus stop would be less convenient for the pedestrian underpass and the hotel. This location has also been considered by TfL (London Buses) and LB Brent. In the original proposal that was viewed by TfL at the pre-application stage, it was proposed that the bus stand would be replaced by a set down/pick up area for the hotel. The following was contained in the GLA Pre-Application Report.

"TfL London Buses state that in fact, the two stops / stands in question are used by First Group as required. Therefore TfL cannot support the above proposal to utilise half the available stop / stand space for taxi and coach drop off. Furthermore, bus stop and standing space in the Park Royal area will become

more important in coming years as the large quantum of permitted development in the area starts to be delivered. As a result of this planned development, the bus network is likely to change substantially, changing requirements for stops and stands

Furthermore, the presence of roundabouts on either side of this location means that it is prime location for having a bus stand and any loss will be strongly resisted.”

In the light of this comment the proposal for the provision of the set down/pick up area for the hotel was amended. This drew the later response from TfL that was included in the GLA Stage 1 Report

“With previous proposals for this site, TfL objected to the extension of the bus layby along with the removal of the bus stand on the south side of Coronation Road. This matter appears to have been addressed in the current proposals which would result in the south side layby being extended, with both stop and stand retained though relocated approximately 19 metres to the east. TfL has considered the proposed highway plan for these alterations and considers that they are reasonable.”

In its comments LB Brent did not object to the principle of the extension to the layby, but did wish to see the inclusion of a splayed kerb to avoid drivers confusing the layby as lane. This was expressed as follows.

“TfL have confirmed that they are agreeable to the repositioning of the bus stop and bus stand and so these works are considered to be acceptable in principle. However, a splayed kerb must be retained at the eastern end of the lay-by to avoid causing confusion to drivers who may otherwise be misled into believing there are two exit lanes on this arm of the roundabout.”

That advice will be incorporated into the final design. It is considered that the inclusion of a splayed kerb should ensure road safety is not compromised

In its response in the GLA Stage 1 Report TfL noted the increased distance to the bus stop but did not raise any objection. Whilst there will be some additional walking distance this is not a material consideration.

Trip Generation Rates

LB Ealing has expressed concern with regard to the fusion of TRAVL and TRICS methodology and the total number of trips which is quoted as being 166 departures.

The data that has been used is taken from the TRAVL database. The trip rate has been calculated by summing all of the data and then dividing by the total number of rooms for which that data applies, which is the TRICS’ methodology. Because the survey data for the sites covers different time periods the production of an average trip rate without reference to the size of the development can bias the results as larger and smaller sites fall into and out of a time period. The TRICs methodology produces a more balanced result. This approach was adopted and acceptable to TfL and LB Brent for the transport assessment of the proposal for the consented, revised masterplan for First Central which also included in the assessment, but not in the application, a 200

bedroom hotel.

In its initial response to the planning application TfL noted that two of the sites that had been taken from the TRAVL database were in fact the same location but with a change of name. The two sites in question were the County Hotel and the Woodford Moat House. The tables that form Appendix C of the TAR were revised with the earlier survey data (TRAVL ref 120) removed. A copy of the revised Appendix C is provided with this response.

The consequence of the removal of the site is that the overall trip rate increases by approximately 11% but in terms of vehicular traffic this is matched by a reduction in the modal split for 'car driver' to the extent that the increase in the number of car movements is just five. TfL in the GLA State 1 Report comments that,

"Whilst this has resulted in an overall increase in trip rates, there would be a reduction in the vehicular mode share and trips. TfL agrees that these proposals would have a minimal impact on traffic levels on the TLRN."

The observation that the trip generation methodology results in just 166 departures is incorrect. With the correction for the site that was included twice the total arrivals between 07:00 and midnight are predicted to be 507 persons and the departures for the same period 522 persons.

Whilst it is correct to observe that the TAR did not present local junction flows, the tables in Appendix C did provide trips by mode for each hour that was covered by the data extracted from the TRAVL database. Turning movements were not provided in the report on the basis that the operation of the network had previously been considered for a scenario in which there was a hotel with 200 bedrooms and the additional number of vehicles associated with the additional 29 bedrooms was shown in Appendix C and can be seen to be small, particularly in the light of the ARCADY results that had been extracted from the First Central Transport Assessment Report (that was submitted for the consented outline scheme.

Considering the revised tables, the critical flows on the Underground would be the departures in the morning peak and the arrivals in the evening peak. The respective figures for the hours commencing 08:00 and 17:00 are 12 and 16 respectively. In terms of the impact on the Underground, the worst case would be that all of these journeys were towards central London in the morning and returning in the evening. It can be seen from Table 5.1 in the TAR that the combination of the Piccadilly and Central lines results in 22 trains travelling eastbound between 08:00 and 09:00 and 21 trains travelling westbound between 17:00 and 18:00. It can therefore be concluded that there would be no perceivable impact on the Underground network. The data presented was sufficient for TfL to be able to report in the GLA Stage 1 Report that "there would not be a perceptible impact on the underground network".

With regard to the impact on buses TfL in that document also states that "£450,000 has already been secured from the wider masterplan towards the provision of an additional bus per hour frequency on route 226". This service provides a direct link between the hotel and Underground stations at Golders Green, Harlesden, Hanger Lane, and Ealing Broadway, London Overground services at Willesden Junction, and national rail services at Ealing Broadway. The local highway around the hotel was constructed in the expectation that the site would be occupied by a 150 bedroom hotel. It has been noted by LB Brent that the original transport assessment for the First Central masterplan used trips rates for the hotel that were taken from hotels around the country and did not

reflect the modal splits that are achieved in London. As a consequence it is reported in the LB Brent review that “despite the increase in the number of bedrooms, this hotel is now considered to have less impact on the local highway network than originally thought”.

Travel Plan

LB Ealing has been critical of the draft Travel Plan which is contrary to the view taken by LB Brent which wrote,

“Nevertheless, a draft Travel Plan has been submitted for the hotel, setting out a range of measures with the aim of significantly reducing staff journeys by car over a five year period following opening of the hotel, with progress to be monitored on an annual basis. The Travel Plan has been assessed using TfL’s ATTrBuTE programme and has scored a PASS rating. The plan is therefore suitable for inclusion within the S106 Agreement in its current form, alongside a clause requiring its implementation.”

TfL also welcomed the submission of an interim workplace travel plan.

It is suggested that the Travel Plan should include baseline data and targets for guests. TfL’s document **Travel planning for new development in London** states that targets in travel plans should be SMART, specific, measurable, attainable, realistic and timebound, and should link to the objectives of the travel plan. Whilst it is reasonable for an operator to influence the mode of travel for employees, the operator does not have the same level of control over visitors. Therefore it is questionable whether one could set a target that is either attainable or realistic, in terms of it being attributable to the operator.

URS has produced three travel plans for hotels in London that have received planning approval within the last two years and in none were we requested to include targets for visitors

The Travel Plan provides for information packs to be made available at the hotel reception, in hotel bedrooms and a summary version will be forwarded to potential visitors. The packs would contain the following information,

- brief description of the Travel Plan and the key objectives,
- description and summary timetable of rail services from accessible stations,
- description and summary timetable of bus services that serve the nearest bus stops to the hotel,
- description of local cycle routes,
- information on taxi ranks and local taxi companies,
- reference and details of access to the TfL web-based journey planner,
- reference and details of access to the Department for Transport (DfT)
- web-based journey planner, Transport Direct, and
- contact details of the TPC.

It is also noted that guests who wish to drive to the hotel must register with the hotel if they want to park their car in the car park. This provides an opportunity to remind potential guests of the alternatives to driving.

Two potential additions for ‘Delivering the Plan’ could be to,

- provide a link on the hotel’s main website to the Travel Plan and in particular the links to public transport information and the web-based journey planners, in particular Transport Direct and the TfL Journey Planner, and
- Investigate the selling of Oyster Cards at reception. This would enable guests to travel locally using the reduced fares associated with the Oyster Card.

It is agreed that the cost of the monitoring will be borne by the Operator and will be undertaken by a TRAVL accredited independent field company.

Officer's Response: Noted. Appropriate conditons are recommended and the Travel Plan would form part of the 106 agreement of which London borough of Ealing would be a signatory. To avoid conflict in implementation the conditions imposed on this development will reflect those imposed by London borough of Brent. The position of Brent Highways service on this application is noted below: -

"In summary no objections on transportation grounds are raised subject to (i) a Section 106 agreement to secure (i) an agreement under s278 of the Highways Act 1980 to allow the undertaking of highway works along Coronation Road, involving the extension of the existing bus lay-by by approximately 30m eastwards in broad compliance with the indicative layout shown on drawing HFC-A-L-00-201 Rev.8 (but amended to include a splayed kerb at its eastern end), together with all accommodation works and works to statutory undertakers equipment within the highway arising as a consequence of these works (ii) implementation of the submitted Interim Travel Plan (draft) dated October 2012 for the sites (iii) implementation of the submitted Servicing & Management Strategy (dated October 2012) and (iv) submission and approval of a Construction Management Plan.

It is requested that a condition be attached to any planning permission preventing occupation of the hotel until such time as the coach layover area has been provided along Lakeside Drive." The London Borough of Brent recommendation has been taken in conjunction with this advice.

Regulatory Services (Refuse and Recycling)

Confirmed no objection

Regulatory Services (Pollution Control)

Comments (summary):

Recommended conditions and informatives relating to noise and odour mitigation and construction.

Response: Noted. To avoid conflict conditions would reflect those imposed by London Borough of Brent..

Access:

Comments on access issues.

Landscape and Tree Section:

No comments received. (NB-Brent landscape officers were fully supportive of the proposal),

Building Control:

No objection.

Economic Development: No comments received.

External

Greater London Authority – Planning decisions Manager (Incorporating TFL comments)

Stage 1 Report summarised as: -

The Greater London Authority (GLA) and Transport for London;

A stage 1 response, dated 6 Feb 2013 was received from the GLA which provides the following comment on the proposal:

- The principle of providing a hotel on this site is acceptable in strategic planning policy terms. However there are a number of planning issues that will need to be resolved before the application can be considered to fully comply with London Plan policy. These issues relate to; inclusive design, the proposed energy strategy and transport matters.
- It is recommended that the issues raised in the Stage 1 response be satisfactorily addressed before the applications are referred back to the GLA at Stage 2.

The GLA stage 1 report is summarised as follows:

Land use principle;

- The part of the site that falls within Ealing is designated Metropolitan Open Land (MOL). London Plan policy 7.17 confirms the Mayor's strong support for MOL, and its protection from development that could have an adverse impact on its openness. This approach is also consistent with the NPPF.
- Paragraph 79 of the NPPF states that the fundamental aim of Green Belt policy (and by extension MOL policy), is to prevent urban sprawl by keeping land open. The NPPF also states, (at paragraph 87), that inappropriate development is by definition harmful to such land and should not be approved except in 'very special circumstances.
- The applicant contends that the site's remaining MOL designation (within Ealing) is obsolete as; a) it does not meet current London plan criteria, b) because it fails to take into account why it was originally designated as MOL, and c) because planning permission was granted for a hotel on the site in 1999. The applicant also indicated that it is prepared to enter into a unilateral undertaking with Brent Council not to object to it designating a much larger area of open land it owns to the north of the application site as new MOL.
- The GLA considers there to be two key issues upon which the acceptability of the proposal should be judged. These are; 1) whether it

presents such very special circumstances, and 2) whether London plan policies to protect MOL would be outweighed by other planning considerations.

- GLA officers are of the view that such very special circumstances do exist here given the unique circumstances of the site and its planning history, and should the applicant conclude and sign the unilateral undertaking it has proposed, the wider regeneration benefits that would accrue from the development are considered to outweigh the harm that would result.
- In conclusion the potential loss of MOL is therefore considered acceptable in strategic planning terms.

Proposed hotel use;

- The proposed use is consistent with London Plan policy 4.5, which seeks to achieve the delivery of 40,000 additional hotel bedrooms by 2031, of which 10% would be wheelchair accessible.
- The site is well located within an opportunity area, where there is good public transport access to central London. A hotel use would therefore be acceptable in this location and help deliver the regeneration and employment opportunities sought by the Park Royal OAPF.

Urban Design:

- The massing is appropriate to the scale of buildings in the area. The façade design would create an interesting and striking appearance.
- The proposed bulk, scale and appearance of the building are acceptable in strategic planning terms.
- The incorporation of a retail unit and a new security office to provide surveillance and activity at plaza level are welcomed and would satisfactorily address concerns the GLA raised at pre-application stage.

Inclusive Design:

- At pre-application stage the applicant was advised that there were concerns about level access, particularly with visitors coming from Park Royal station arriving at lower plaza level. The applicant was asked to consider these access arrangements again, and the possibility of a secondary entrance to the hotel from this level. It is noted that this has been considered by the applicant but rejected. The GLA re-confirm that the applicants should look again at providing a secondary entrance to ensure full inclusivity.
- It is suggested that some of the proposed disabled parking bays should

have a vertical clearance of not less than 2.6m, to allow for wheelchair hoists.

- Further details of additional disabled parking bays and details of the retail kiosk's and rooftop accessibility should be sought and addressed before the applications are referred back to GLA at Stage 2 (a planning condition is recommended to secure the submission of these details).

Biodiversity:

- No strategic planning issues are raised, but it is requested that a conservation-orientated management plan be secured through condition. This will be utilised to ensure a long-term commitment to biodiversity on site.

Sustainability:

- This is considered satisfactory from a strategic planning perspective.

Water resources and flood risk:

- The site is in Flood Risk Zone 1 and the development does not pose a flood risk.
- To minimise surface water run-off it is noted that the FRA proposed attenuation through the installation of tanks, in order to restrict discharge from the site. Further attenuation is proposed through the provision of green roofs. The GLA accept both measures, and request a condition to secure these measures.

Energy:

- The applicant's energy strategy broadly follows the London Plan energy hierarchy to reduce carbon dioxide (CO₂) emissions. But further revisions and information is required before the proposals can be considered acceptable and the CO₂ savings verified.
- In terms of the *Be Lean* measures the applicant is asked to verify the savings to be achieved in regulated CO₂ emissions, as a result of the energy efficiency measures proposed.
- In terms of the *Be Clean* measures it is noted that the applicant is proposing to connect the hotel to a wider district heating network within the vicinity of the site. The applicant is also proposing a site wide heat network, and the applicant should confirm that all rooms and areas of the hotel will connect to this site network.
- In terms of the *Be Green* measures the applicant has investigated the feasibility of renewable technologies and is proposing to use air source heat pumps (ASHP), this technology will provide space heating and

cooling to the building. The GLA comment that ASHP and CHP are conflicting technologies competing for heat demand within the building. The applicant is asked to confirm that the ASHP will be a centralised unit serving the building via a network, and that it will not be individual units for each room.

- The applicant is asked to provide further clarification on the overall savings of CO2 emissions, after each stage of the energy hierarchy.

Transport:

- A total of 90 parking spaces are proposed, including 20 accessible parking spaces. Whilst the London plan does not specify a maximum parking level for hotels in more moderately accessible areas, it is noted the applicant has applied Brent Council 2004 standards. This results in 46 spaces for the hotel use and 28 spaces for the staff (74 in total). However, a further 11 spaces are proposed on top of this for non resident visitors to the food and drink facilities to be provided within the hotel.
- Due to the hotels out of centre location TfL does not consider that the visitor numbers will justify the additional 11 spaces, and recommends their deletion.
- 20% of the final number of spaces agreed shall be fitted with electric vehicle charging points (EVCP's), and this should be secured through condition.
- TfL agrees with the applicants trip generation assessment, which finds that the development would have a minimal impact on traffic levels and on the public transport network (including London Underground).
- The proposed extension and re-location of the bus lay-by on Coronation Road is supported by TfL.
- The trip generation assessment shows it likely that hotel trips would occur outside the network peak, therefore no further mitigation will be required. TfL also note that £450,000 has been secured from the wider masterplan proposals for the First Central site towards bus service improvements.
- TfL supports the provision of a coach parking area/lay-by along Lakeside Drive, subject to the submission and approval of a coach management strategy.
- As the hotel will include conference/function/event space TfL considers that the demand for taxis may have been underestimated, and would support the provision of a dedicated taxi rank. However TfL accepts the applicants justification for not providing such a facility.

- TfL notes that as part of the wider masterplan proposals for the First Central site that a contribution of £550,000 has been secured specifically for improvements to pedestrian and cycle links. The identified improvements included the footbridge over the rail lines, Mason's Green Lane (connecting to Park Royal station) and the pedestrian subway under the A40. Whilst this funding will deliver improvements there is a limit as to what works can be undertaken with this amount. TfL therefore requests further s106 funding to help deliver wider pedestrian improvements.
- TfL welcomes the provision of a workplace travel plan.

Response: Following Members resolution on the application it will be necessary to consult the GLA again for the Mayor's Stage 2 response.

Crime
Prevention
Design Adviser:

Summarised The main problems experienced at Hotels is theft from the customers vehicles.

Other recommendations:

- **CCTV:** To be effective, both in terms of deterrence and to support any prosecutions, the system will need to provide “identification quality” recorded images of persons entering the car park on foot or in a vehicle. The registration marks of vehicles should also be recorded. An Operational Requirement for the system should be created – further details of which are available at http://scienceandresearch.homeoffice.gov.uk/hosdb/publications/cctv-publications/28_09_CCTV_OR_Manual.pdf?view=Binary
- **Lighting:** The lighting should achieve the standard required by BS 5489. The Overall Uniformity of light for the development is expected to achieve a rating of 0.4Uo and should never fall below 0.25Uo. The Colour Rendering qualities of lamps used in an *SBD* development should achieve a minimum of at least 60Ra (60%) on the Colour Rendering Index
- **Valuables Security:** Guests can be reluctant to store valuables such as laptops etc in the rooms, often leaving them in their vehicles. Consideration must be given to supplying guests with suitable lockable storage to reduce the risk of theft from either vehicles or rooms. It is recommended that there are safes in each room or secure storage in an area that benefits from good natural surveillance from reception staff.
- **Physical Security Standards:** I would recommend the applicant adopt the following Physical security standards in order to reduce the risk of crime and disorder.
- **External Doorsets:** successfully tested to LPS 1175 Security Rating 2 or Certificated to BS PAS 24-1:1999 “Doors of enhanced security” and PAS 23-1: 1999 General performance requirements for door assemblies
- **Room Doorsets:** preferably successfully tested to LPS 1268 (Draft) Specification for testing and classification of hotel doorsets, if not then Certificated to BS PAS 24-1:1999 “Doors of enhanced security.”

Environment
Agency:

We have no objection to the proposal or any conditions to add. The planning application form indicates surface water will be disposed of by SuDS and main sewer and due to the bus parking area included in the proposal we request the following informative be placed on any planning permission granted:

Informative

Drainage to soakaway from car parking areas for >50 spaces should be passed through an oil interceptor before discharging to ground. The Environmental Permitting Regulations make it an offence to cause or knowingly permit any discharge that will result in the input of pollutants to groundwater.

Response: Noted

London Fire Brigade: The applicant is advised to ensure the plans conform to part B of the Approved Document of the building regulations and that the application is submitted to Building Control who in certain circumstances may be obliged to consult the Fire Authority.

Response: Noted

National Grid: No comments received.

Ealing Community Network: No comments received.

Natural England No objection, commented that the ecological survey submitted with this application has not identified that there will be any significant impacts upon statutorily protected sites, species or on priority Biodiversity Action Plan (BAP) habitats as a result of this proposal. However, when considering this application the council should encourage opportunities to encourage biodiversity and around the development in conjunction with the NPPF.

Response: Noted. Appropriate condition in respect of biodiversity is recommended.

Park Royal partnership: No comments received.

London Underground Limited: No comments received.

Southern Electricity: No comments received.

Thames Water: See informative note. Conditions recommended in respect of Drainage Strategy.

London Waste Regulation Authority: No comments received.

Highways Agency: Confirmed no objection.

(HS2) High Speed 2 (HS2)

The site was originally identified as a potential works site for the construction of the proposed High Speed Rail Link 2 (HS2) between London and Birmingham. HS2 Ltd are currently undertaking a consultation of various landowners and other stakeholders along the route of the proposed HS2 over land that may be safeguarded as part of the project. Since their original representation, which objected to the proposal, HS2 have met with representatives for the applicant. Following a meeting of the 7 March 2013, HS2 have concluded that they no longer anticipate any conflict between the HS2 construction activities and the hotel site.

Response: Noted. The safeguarding will only achieve statutory status if and when the HS2 bill is approved by parliament. At present the application must be considered against the current policy framework. It would therefore not be reasonable to refuse or delay making a decision on this application on the basis of possible future legislation. It should also be noted that the site already has planning permission for another development.

No response

West Twyford
Residents
Association

No response.

Heathrow
Airport

No comments received

Civil Aviation
Authority

No comments received

Ealing Civic
Society

No comments received

London Wildlife
Trust

No comments received.

Ward
Councillors

Reasoned Justification:

Background

The site was once part of the former Guinness brewery complex that was closed down in 2002, and all associated buildings demolished soon after. In 1995, Ealing and Brent Council's adopted a Planning Brief to guide future development of the area. This envisaged significant employment development, supplemented by a hotel, residential units and other ancillary uses, together with road access improvements.

In 1998 outline planning consent was granted by Ealing and Brent subject to s106 agreements for a masterplan, incorporating a mixed-use development on a 22.18 hectare site, including 116,100m² of offices (Use Class B1); 61 residential units; new Underground station including ancillary retail; 150-bed hotel; indoor leisure facilities and open space; with associated access/servicing, landscaping and car-parking, including demolition of existing brewery and leisure buildings. Full planning permission was also granted for the construction of a new access road from the A40 Western Avenue.

Following the approval of Reserved Matters construction works commenced in 2002, including the construction of the A40 access road, and improvements to Coronation Road. To the north-west of the application site, the Diageo headquarters office building was built, together with a second speculative office building along side – this second building still sits vacant.

In 2008 the road network improvements were completed, resulting in the extension to Rainsford Road which links this to Coronation Road.

Due to the change in market conditions it was no longer considered viable to build out the consented scheme that was heavily weighted towards the provision of office floorspace. In 2010 outline consent for a revised masterplan was granted, this includes a greater proportion of residential development, provision for a dedicated energy centre to serve all the new developments plots, including the proposed hotel, but this excluded the application site from the masterplan area. Planning permission for this revised scheme was granted in March 2012.

The revised masterplan is still centred on the 1999 outline consent that includes a central landscaped park on the northern side of Coronation Road. Approved building heights range in heights between seven and ten storeys, with ten storeys approved directly opposite the application site on the northern side of Coronation Road.

It is also relevant to the proposal to mention that one of the initial phases of the masterplan was the provision of a new public open space. This has been delivered, and known as West Twyford Park this provides a green link from Mason's Green Lane to Twyford Abbey Road.

Principle of Development

The principle of a large hotel on this site has been previously accepted, having been supported in the original planning brief, and granted in the original outline masterplan for the former Guinness brewery site.

In Ealing the land is designated as Metropolitan Open Land (MOL) and the proposal results in the loss of MOL. In assessing the principle of this development, this scheme is considered against the above relevant policies contained within the London Plan, Development Strategy and UDP in relation to its status as Metropolitan Open Land and also in light of the planning history of the site. In particular the approval of a previous application 03859/4 granted 15th July 1999, which included provision for a 150 bedroom hotel on the same site, as part of the comprehensive redevelopment of land within the former Guinness site.

In 1999 the land was designated as Metropolitan Open Land (MOL). At that time, the view was taken that the loss of the MOL was acceptable due to the overall regenerative benefits deriving from the First Central scheme.

The principle of a new hotel in such an Opportunity Area is encouraged by London-wide policy 4.5 – London's Visitor Infrastructure, which is seeking to achieve 40,000 net additional hotel bedrooms by 2031. The extent of the MOL network in the borough and encompassing this site was recently

confirmed through the adoption of the Development Strategy in April 2012. It is accepted however that if such a proposal were implemented and built out on the ground, it is likely that the boundaries of the MOL designation relating to this site would need to be strategically reviewed again.

In terms of local policy context, Policy 6.7 in the Council's Adopted UDP relates to hotel development. This policy indicates they will be given positive consideration on sites within town centres and in areas with good public transport access.

Whilst not located within a town centre, the site has a public transport accessibility level of 3/4 (Good) and is well placed to maximise the range of sustainable transport options available for the intended use. It is sited on the opposite side of the Western Avenue via the footpath/cycle path Masons Green Lane to Park Royal underground station on the Piccadilly Line, and there are regular bus services that run along the Western Avenue and past the site on Coronation Road. Hanger Lane station on the central line is nearby and a bus service passes the site.

In addition to being located within MOL, the site is also designated as a Green Corridor on the Proposals Map to the Council's UDP. Policy 3.2 indicates development will not normally be permitted within Green Corridors and development adjoining or affecting their setting will be expected to enhance their visual, nature conservation and recreational qualities. However, landscaping and environmental improvements would be provided on key frontages to enhance the visual amenity of the immediate site context and wider environment of the Western Avenue.

Pertinent to the above policy context, is the fact that planning permission was granted in outline in 1999 as part of the First Central proposals for a hotel on the site. On this basis, favourable consideration is likely to be given to the provision of a hotel at this site.

Although not now part of a much larger regenerative scheme, the Council considers that the proposal would prove beneficial to the area in general, given the relationship to existing public transport infrastructure nearby and its strategic importance to the future regeneration of the First Central site. Given the landscaping and environmental improvements that would be implemented in context to its Green Corridor setting, it would now prove difficult for the Council to resist the principle for a hotel on the site and subsequent loss of this land as MOL.

Therefore, in the light of existing local, regional and national policy, along with the planning history on the site, there is not considered to be any material change in circumstances over the past 13 years to now warrant refusal on the grounds of principle.

The GLA also confirm that very special circumstances exist here that allow them to support the loss of MOL, these circumstances exist here due to the unique circumstances of the site (i.e. that it is fenced off with no public access) and its planning history (i.e. that the principle of hotel development on MOL has previously been granted approval)..

Design, Scale and Siting

Good design is a central objective of the London Plan (2011) and is promoted by policies within Chapter 7 'London's Living Places and Spaces.'

London Plan Policy 7.4 'Local Character' requires development to have regard to the form, function and structure of an area, place or street, and the scale, mass and orientation of surrounding buildings. Policy 7.5 'Public Realm', Policy 7.6 – 'Architecture' and Policy 7.7 'Location and Design of Tall and Large Buildings', sets out a range of design criteria for such proposals. These policies seek to ensure that such buildings do not have an unacceptable impact on their surroundings.

The Council's own adopted UDP Policy 4.1 require new buildings to reflect the character and style of the area reflecting any predominant or special features such as fenestration, entrances, roof lines, materials and finishes. Table 4A of the UDP provides a suite of urban design criteria and Table 4B provides assessment criteria applicable for high buildings exceeding 20m in height.

The current proposal is for a hotel on the site of the previously approved hotel. Whilst there is an increase in number of bedrooms (from 150 to 229), and subsequent increase in height and massing, the general impact on the openness of the adjoining remaining MOL and Green Corridor land would broadly remain the same.

The site is located adjacent to an area to the north that is or is proposed to be primarily commercial/industrial, where the majority of existing development is generally reflective of their intended uses. On the opposite side of Coronation Road is the Diageo HQ building and the vacant Building B, whilst other office buildings are proposed on neighbouring sites. The height, form and scale, of these adjacent office buildings relate to the hotel proposed, but they occupy much larger plots that offer scope for landscaping and provide a setting for the building. Neighbouring land on the south side of Coronation Road is open in character. It is therefore important that the design and appearance of the building makes a significant contribution to the visual amenity of the area, which is it considered would be achieved.

The massing of the proposed building is broken down by the two primary elements – the plinth and tower. The plinth is articulated as two elements, a glass element at Coronation Road level which gives the impression of the tower element floating above this, and the secondary masonry element below connects Coronation Road level and the lower piazza level. The tower is expressed as different elements with the main central element containing the bedrooms, this is to be treated with a type of anodized aluminium rainscreen cladding. The top two floors are to be treated with a glazed curtain wall, and this helps to make the tower element appear lightweight. Sitting above this glazing is a protruding canopy feature. Full details of the palette of materials will be secured as a condition of any approval, this will ensure that there is sufficient control over the quality of the external finishes to the building.

The GLA express their support for the approach, commenting that “*the façade design responds appropriately to the massing, and would create an interesting and striking appearance*”.

Access

Visitor access and legibility has presented one of the main challenges to the design, layout and function of the building. This is because of the split level approach.

The main pedestrian approach to the site is from Park Royal underground station, via Mason's Green Lane, which is a pedestrian only route. Mason's Green Lane opens out into a public piazza space immediately adjacent to the western end of the proposed building. Stepped access and ramped access currently exists which provides a connection for pedestrians from piazza level to Coronation Road street level, which is approximately 1-storey higher.

The main public entrance is located at Coronation Road level, this is a deliberate response to the fact that the majority of hotel guests and visitors will arrive by vehicle, whether bus, hotel or airport courtesy minibus, coach, taxi or car, and not primarily by underground, via Park Royal Piccadilly line station. As a response to this the main public functions of reception, lounge, bar, dining and function spaces are arranged at this level, and these uses provide an active frontage to the street level along Coronation Road.

The GLA has expressed some concerns with the buildings legibility, and their main reason for this is the split level approach described. This is not seen to be ideal for disabled users. This was flagged up by the GLA at pre-application stage, and the applicants were asked to look at the possibility of creating a secondary public entrance so that customers could enter at piazza level. The GLA re-confirm in their Stage 1 response that this should be re-considered as it would ensure full inclusivity to the building. The applicants position is that functional, operational and security requirements dictate that a single point of entrance is essential, and that this is best located at Coronation Road.

Two principal vehicle access points are proposed for those arriving by car/vehicle. A vehicle set down is to be provided at entrance level on Coronation Road. This will require the re-positioning of an existing bus lay-by, and this is supported by Transport for London (further discussion on this can be found in the '*Transport*' remarks section). Alternatively a secure car park is proposed at basement level, and will be accessed via a new road along the southern edge of the site which forms an extension to an existing hammerhead on the eastern roundabout on Coronation Road. Servicing access will also be gained via this new road.

External spaces

Due to the building footprint opportunities for landscaping are limited. A new frontage along Coronation Road is proposed, this hard landscaping has been designed to adoptable standards. New paving will be laid from backedge of footpath to the hotel entrance, with different colours and textures laid to delineate the main entrance. A raised planter is also proposed along the building frontage to soften the frontage.

At the western end of the building is the interface with the lower piazza level. The building aims to respond to the piazza by locating the car park security office at this level (which will be permanently manned). It is also proposed to provide a retail unit at this level, which would be available to rent to a local start-up business at below market rates. Outside seating to the unit is also proposed, this will give a greater level of activity to the space. The siting of both these units will provide better natural surveillance of the plaza level, and will be a marked improvement because at present this space is not overlooked, or particularly well used because of the perceived fear of crime this space presents. The GLA welcomes this response and this satisfactorily addresses concerns that had been expressed at pre-application stage.

On the upper levels to the building external spaces have been created at first and eight floors. These will be hardwood decked spaces, softened with raised planters, shrubs and trees within planters and bespoke timber seating, offering guests the use of high quality outside spaces.

Above the function suite space an extensive green sedum roof is proposed, this will also include evergreen climbers to screen the plant enclosure walls. The green roof will provide sustainability and biodiversity benefits, as well as aiding with the visual impact of the roof space and plant, and further details of its construction is requested through condition.

Internal Layout and uses

Basement level and lower ground floor will contain all the parking and servicing space. The ground and first floors will include the main hotel reception, lounge, bar, restaurant, function space, meeting rooms, conference space, fitness suite together with the necessary back office support functions.

The function suite is provided with its own separate entrance, and will be capable of seating 225 diners. This will support the conference and business functions of the hotel, as well as being available for private hire.

Guest bedrooms, totalling 229 will be spread over the upper eighth floors of the building (second floor level and above). Of the 229 guestrooms, 26 of these are suites and these are to be located on the top two floors, and 10% of rooms are wheelchair accessible.

<u>Description of use</u>	<u>Measured area/sqm</u>
229 Guest rooms (incl circulation)	8134 sqm
Public areas (reception, bar, restaurant etc)	882
Function suite	480
Business/conference centre	503
Back of house functions	1890
Car parking/servicing	2923
Lower piazza level retail unit	38

Total gross internal floor area: **14, 850**

Transport and Servicing

The site has good public transport access, with PTAL 3/4. Park Royal (Piccadilly line) and Hanger Lane (Central line) are both within 960m (12 minutes walk), and there are three bus services within 640m (8 minutes walk), these are bus routes 95, 226 and 487.

On street parking in the area is generally restricted, with on-street parking available along Coronation Road to the east of the site, which actually lies within the Borough of Ealing.

A total of 90 parking spaces are proposed within two levels of basement parking. This includes 20 disabled spaces and 27 electric vehicle charging points. Four motorcycle spaces are shown at basement level, along with 24 cycle parking spaces. Servicing provision has been included with a 12m loading bay proposed at the eastern end of the building.

All vehicle access is to be via a new 4.5m service road at the southern end of the site, this is to be accessed via the existing unused fifth arm of the Coronation Road/Rainsford Road roundabout, and is in conformity with the original Masterplan for the First Central development.

Highway works are proposed to the front of the site along Coronation Road, to extend the existing bus lay-by to also accommodate a 'setting down' area for taxis and coaches, with the existing bus stop repositioned further eastwards. Furthermore works are proposed along east along Lakeside Drive within the London Borough of Brent to create an off-street coach only lay-by, waiting area.

The overall impacts of the proposal and surrounding development on the local transport network have been considered at length, dating back to the original masterplan consent for the First Central development. The Transport Assessment for the revised masterplan in 2010, factored in a 200-bed hotel as that size of hotel was under consideration at the time. As such the impact of a large hotel on this site has already been accepted.

The TA produced by URS has used survey data of trip rates, based on five similarly sized hotels in outer London, in order to derive estimated vehicular trip numbers. This exercise shows there to be expected peak periods of 8am-9am and 5pm-6pm. This is based on 2010 data, and is specifically in relation to a 200-bed hotel that was being considered at that time. In comparison a 229-bedroom hotel as now proposed, and the additional impacts on the public transport network will be minimal over and above the previous approval.

TfL agrees that the proposal would have a minimal impact on traffic levels, and that there would not be a perceptible impact on the underground network.

Parking levels

The planning application is accompanied by a Transport Assessment including draft Travel Plan. UDP policies 9.1 and 9.9 seek to ensure that planning permission is only granted for development that ensures traffic safety. London Plan Policy 6.3 states “development proposals should ensure that impacts on transport capacity and the transport network, at both corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network”. London Plan Policy 6.13 states “The Mayor wishes to see an appropriate balance being struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use”.

The site has a PTAL level of 3/4 (which is good) and within close proximity to Park Royal station on the Piccadilly Line and Hanger Lane on the Central Line. There are three bus routes within walking distance of the site.

Within UDP Parking Zone 2, the maximum car parking for hotels required under the Council's standards would be 1 space per 3 rooms, i.e. a maximum of 73 spaces. The London Plan (2011) does not set any maximum standard for hotels, but indicates: “In locations with a PTAL of 4 – 6, on site provision should be limited to operational needs, parking for disabled people and that required for taxis, coaches, deliveries and servicing”.

90 car parking spaces are proposed (of which 20 would be to a disabled standard). This level of provision has been met with concern by Transport for London and Ealing, as set out in the GLA's Stage 1 report and Ealing transport Officer's. TfL have expressed that the number of spaces should be limited to a maximum of 74, in line with adopted standards.

The applicants have set out that it is their position that a minimum of 90 parking spaces is required for staff and guests in order to make the scheme commercially viable and a full response to Ealing's transport officer's position justifying the level of car-parking proposed is contained above. This response by URS justifies the increase in car-parking over and above adopted standards and states that due consideration has not been given to the ancillary uses, which would be open to the public.

It is noted that the London Borough of Brent's parking standards support an increase of a third (above maximum standards) in Park Royal, provided the following can be demonstrated;(a) that is a key regeneration proposal in the area; and (b) the transport and environmental impacts of the development area acceptable; and (c) the proposal secures significant and sufficient public transport/walking/cycling improvements, and/or contributions towards on-street parking controls, and implementation of a green transport plan. The view of Brent's Highways officer's is that the proposed development satisfies each of the above criteria, and on this basis the parking levels can be justified in this location, notwithstanding the GLA's position.

The applicants have submitted a transport update to the GLA to respond to issues raised in the GLA's Stage 1 report, and to justify the parking levels proposed, the details of which are noted above.

Any further comments the GLA have will be reported through the supplementary report. So, subject to the GLA confirming their position, and in the event they insist on a reduction in parking spaces, otherwise a direction of refusal under Stage 2 may follow Members are therefore requested to delegate authority to Officer's to attach a planning condition, requiring the submission and approval of a revised parking layout showing a reduction in parking numbers (with other associated changes) to an agreed level.

Servicing

A 12m loading bay is accommodated at the eastern end of the building. Access to this and to the two levels of basement parking is to be via the new southern access road, to the rear of the building. No transport concerns are raised.

Coach parking

The coach drop-off/pick-up point that is to be provided along Coronation Road is not sufficient by itself to satisfy the requirements for a hotel of this size, and neither would this be suitable for long-term overnight parking. The GLA advised the applicants at pre-application stage of the requirements for coach parking, as set in London Plan policy 6.13 (1 coach parking space per 50 hotel rooms). Due to the constraints of the site it has not been possible to accommodate this on-site. The applicants solution, in order to meet London Plan policy and Brent's adopted servicing standards has been to propose a dedicated coach parking area off-site, eastwards along Lakeside Drive. This is approximately 90m north of the hotel site, and will be large enough to accommodate 2 full sized coaches, or 3 midi sized coaches.

The GLA supports this and consider that this will deal with likely demand and prevent coaches from standing on Coronation Road, which could potentially disrupt bus operations along here. Brent Transportation Officer's also support the approach.

This coach parking area is fully within the London Borough of Brent and is to be privately maintained. Subject to the access works to the coach parking area being incorporated into the s278 Highway agreement works and to a planning condition enforceable by Brent restricting the use of the parking area for coaches only there would be no objection to this. A coach management strategy would be secured through a condition imposed by the London Borough of Brent in order to address the GLA's request for this.

Travel Plan

In an attempt to try to maximise the use of non-car modes of transport to and from the site, a draft Travel Plan has been developed by URS and submitted. This sets out a range of measures with the aim of significantly reducing staff journeys by car over a five year period, with progress to be monitored on an annual basis. The Travel Plan has been assessed using TfL's ATTrBuTE programme and has scored a PASS rating. The plan is therefore considered suitable for inclusion within the s106 agreement in its current form, alongside a clause requiring its implementation.

Landscape

Opportunities for landscaping at street level are limited, this is mainly due to the size of the site, its relatively shallow depth and the need to accommodate servicing access. To off-set this, the strategy is to deliver a high quality semi-public/semi-private front forecourt to enhance the public realm, and to provide high quality public terraces (with planting) on the upper floors.

The site at present consists of lawn and to its northern edge is a row of nine semi-mature Lime trees. Removal of these trees is required. Given the urban character of the site it is not unusual to see buildings in areas such as this without a landscaped setting, and the need for more generous landscaping is outweighed in this instance by the regeneration benefits this proposal would deliver. A contribution of £10,000 towards the '10,000 trees in Park Royal' project, payable to the London Borough of Brent, which would help to deliver public realm improvements.

Biodiversity

The southern edge of the site forms part of a larger east-west Green Corridor, which London Plan policy 7.19 (Biodiversity & access to nature), requires boroughs, to identify, protect and enhance. The proposal does not break the Green Corridor.

The ecological appraisal has due regard for legislative requirements and the planning policy context and has been submitted in support of the application. This includes a detailed desk-top study, and a site walk over was carried out. This confirms that the site is not designated for its nature conservation value, and that there is no evidence of protected species or habitats on site. The risk of finding roosting bats is found to be negligible and no further survey work is recommended.

Protected species are unlikely to be a constraint to development and further survey work is not recommended.

Notwithstanding this it is proposed to maintain this Green Corridor, and extend it from the point at which it currently terminates at the point of the piazza. This proposed extension of the pedestrian and cycle routes will connect through to the roundabout on Coronation Road, and will also maintain the Green Corridor as an access route from Twyford Abbey Road to the north to Coronation Road and Rainsford Road to the south. The GLA has requested that a *conservation-orientated management plan* be utilised to ensure the sites long-term commitment to biodiversity, and compliance with relevant London Plan policies, and that this should be required through planning condition. An appropriately worded condition secures this.

Sustainability/Energy Measures

Sustainability and energy measures which are coming forward as part of this proposal, are outlined in the applicant's supporting Energy and Sustainability Statement. The energy statement sets out measures as to how the development would comply with London Plan policy 5.2, which requires development proposals to make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy to;

Be Lean: use less energy
Be Clean: supply energy efficiently
Be Green: Use renewable energy

The *Be Lean* measures that are proposed to achieve CO₂ savings are proposed to be achieved through a range of passive design features and demand reduction measures. High performance in terms of air permeability rates and heat loss are aimed for.

The GLA has requested that the applicant provides further information in order to verify the savings in regulated CO₂ emissions resulting from energy efficiency measures alone. This information is currently in the process of being compiled for submission to the GLA.

In order to meet the *Be Clean* objectives the applicant is proposing to connect the development to a local, district heating network that is being bought forward as part of the wider masterplan proposal for the area. The First Central site has consent for an energy centre, which will incorporate a Combined Heat and Power (CHP) unit, this is to be utilised by the hotel for decentralised energy supply. Though at this stage the GLA are seeking verification on CO₂ reductions.

In order for the development to meet the *Be Green* objectives the applicant has investigated the feasibility of a range renewable energy technologies. Following this exercise it is proposing to install air sourced heat pumps (ASHP) that will perform the function of space heating and cooling. Though it is noted by the GLA in their Stage 1 report that ASHP and CHP are conflicting technologies, both competing for heat demand within the building. The applicant is therefore required to confirm that the ASHP will be a centralised unit serving the building via a network, and not individual units provided for each room. This has been requested, and an update will be reported in a supplementary report.

The applicant submits that the above strategy, based on low zero carbon technologies will mitigate the London Plan target of a 25% reduction in CO2 emissions.

In summary there is broad acceptance for the strategy, however the applicant is required to provide further verification of the CO2 emissions savings before the GLA give support to the energy strategy. Further calculations showing residual CO2 emissions after each stage of the Mayor's energy hierarchy are requested. These should then be used as a comparison against a 2010 Building Regulations compliant development.

As it stands the applicants are currently in discussion with the GLA in order to address their Stage 1 comments, verify CO2 savings and agree the proposed energy strategy for the development. A supplementary report is currently being produced by the applicants, responding to the issues raised by the GLA. In any event members are reminded that they are requested to delegate authority to the Head of Area Planning to agree the exact s106 Heads of Terms, including the sustainability and energy measures.

BREEAM

The proposed development is targeting a BREEAM rating 'Excellent', this will satisfy Ealing's Core Strategy and a BREEAM pre-assessment has been submitted to demonstrate how this will be achieved. Further details of this and post completion verification of the BREEAM rating will be required through the s106 agreement.

Flood risk

The subject site falls within Flood Risk Zone 1 and accordingly is situated within an area of low risk of flooding. The Environment Agency has confirmed they have no objection to the proposal or any conditions to add.

Other Supporting Documents

An Air Quality Assessment has been submitted as the site falls within a designated Air Quality Management Area (AQMA). Environmental Health officer's are satisfied that there will be no significant impacts on air quality caused by traffic..

A Noise and Vibration report has been submitted. The report recommends suitable glazing performance for the hotel bedrooms that face onto the railway, this will ensure good resting conditions.

London Borough of Brent's position on the proposed development

A number of meetings have taken place with Officer's from Brent and the application was reported to Brent's planning committee on 13th March 2013 and agreed, subject to referral to the Mayor and completion of a legal agreement of which the London Borough of Ealing would be a signatory.

As this is a cross-boundary application then there should be consistency between Boroughs with regards to planning conditions and the s106 legal agreement. The conditions in this report reflect the conditions imposed by Brent Council at there 13th March 2013 Planning Committee meeting. It is not considered that the conditions as suggested above would cause conflict or difficulties in the implementation of this development.

CIL

In addition to S106 contributions and other requirements, the Mayor's Community Infrastructure Levy (CIL) was adopted on 1st April 2012. This has introduced a charging system within Ealing of £35 per sq. of gross internal floor area to be paid to the GLA. On the basis of the floorspace being created, which is

14,850sqm (GIA). The liable CIL for this development would be £519,750.00. As the London Borough of Brent is the lead authority on this application, the CIL levy will be collected by Brent..

Human Rights Act:

In making your decision, you should be aware of and take into account any implications that may arise from the Human Rights Act 1998. Under the Act, it is unlawful for a public authority such as the London Borough of Ealing to act in a manner, which is incompatible with the European Convention on Human Rights.

You are referred specifically to Article 8 (right to respect for private and family life), Article 1 of the First Protocol (protection of property). It is not considered that the recommendation for approval of the grant of permission in this case interferes with local residents' right to respect for their private and family life, home and correspondence, except insofar as it is necessary to protect the rights and freedoms of others (in this case, the rights of the applicant). The Council is also permitted to control the use of property in accordance with the general interest and the recommendation for approval is considered to be a proportionate response to the submitted application based on the considerations set out in this report.