

**SEQUENTIAL TEST FOR FORMER REGAL CINEMA,
233 HIGH STREET, UXBRIDGE, UB8 1LD**

DOCUMENT NUMBER: C3565-R1-REV-A

PREPARED BY



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Former Regal Cinema, 233 High Street, Uxbridge, UB8 1LD

Nimbus Engineering Consultants Ltd

Sequential Test Report

June 2025

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1. INTRODUCTION

1.1. Appointment and Brief

Nimbus Engineering Consultants Ltd have undertaken a Sequential Test to accompany the planning application for the proposed change of use of the former regal cinema to a banqueting suite, and construction of a new four-storey hotel at 233 High Street, Uxbridge, UB8 1LD situated within the London Borough of Hillingdon.

A sequential test is required in national and local policy as the proposed development site lies within a Fluvial Flood Zone 1, however is at risk of surface water flooding during a 1:1000 year storm event. The purpose of a sequential test is to demonstrate that the proposed development has been steered towards the lowest flood risk areas, and why other sites within the London Borough of Hillingdon, which are within a Flood zone 1, are not suitable for this development.

Therefore, this report will review the London Borough of Hillingdon Local Plan Site Allocations & Designations, adopted January 2020 that have not been developed in order to apply the sequential test to this site. In addition, a review of windfall sites, sites on the brownfield register, and sites on the open market within the Hillingdon area have been considered for the proposed development.

For the purposes of this report, only commercial sites with a similar density/size of site (35 rooms & Approx. 3221m²), were considered suitable for this development.

1.2. Limitations

The general limitations of this report are that:

- A number of data and information sources have been used to prepare this report. Whilst Nimbus Engineering believes them to be trustworthy, Nimbus Engineering is unable to guarantee the accuracy of data and information that has been provided by others;
- This report has been prepared using best data and information that was available at the time of writing.

2. SEQUENTIAL TEST

The National Planning Policy Framework ('NPPF') outlines the requirement for a sequential risk-based approach to be adopted for determining the suitability of land for development in flood risk areas (either through fluvial, coastal, sewer, groundwater and/or surface water flooding mechanisms) [NPPF, December 2024: Paragraphs 171-181]. Central to this approach is the application of a Sequential Test to prioritise sites in order of flood risk probability and suitability for development, while being reasonable with regards to the proposed development, as per NPPG Paragraphs 027 (Reference ID: 7-027-20220825) and 028 (Reference ID: 7-028-20220825).

The test is used to assess what land is available for development and direct development to areas of lowest risk in the first instance. Where development is proposed within areas known to be at risk now or in the future from flooding, the NPPF requires that a Sequential Test is carried out to demonstrate that there are no reasonable alternative development sites in areas of lower risk [NPPF, December 2024: Paragraphs 173]. However, development of sites within flood risk areas must take account of how development impacts can be mitigated as well as the probability of the flood risk.

The proposed development site is shown to lie within an area at risk of 1:1000 surface water flooding, where there is a low risk of pluvial flooding of up to depths of 0.6m, as can be seen in Figure 1, below. Hotels are classed as ‘more vulnerable’, as described in the NPPF. ‘More Vulnerable’, development is allowable in Flood Zone 3, subject to the Sequential and Exception Tests being passed, as shown on the table below.



Figure 1 – Environment Agency Fluvial Flood Map for the proposed development.

Vulnerability Classification	Essential Infrastructure	Water Compatible	Highly Vulnerable	More Vulnerable	Less Vulnerable
Flood Zone 1	✓	✓	✓	✓	✓
Flood Zone 2	✓	✓	Exception Test	✓	✓
Flood Zone 3a	Exception Test	✓	X	Exception Test	✓
Flood Zone 3b	Exception Test	✓	X	X	X

Key: ✓ Development is appropriate
X Development should not be permitted

3. SITE ALLOCATIONS AND BROWNFIELD REGISTER

This section of the report shows the assessment of undeveloped Hillingdon Borough Site allocations and brownfield sites. Site descriptions, areas, restrictions, and proposed uses can be found within the Hillingdon Local Plan: Part 2 document.

3.1. Site SA1: Enterprise House, Hayes, with the potential capacity for 96 dwellings

Although this site is located within a Flood zone 1, it is earmarked for an office and residential, mixed use development. Therefore, the site is not suitable for the proposed development.

3.2. Site SA2: The Old Vinyl Factory and Gatefold Building, with the potential capacity for 694 dwellings

Although this site is located within a Flood zone 1, it is earmarked for a residential led, mixed use development consisting of two large residential buildings with office/commercial floorspace. Therefore, the site is not suitable for the proposed development.

3.3. Site SA3: Eastern end of Blyth Road, Hayes, with the potential capacity for 273 dwellings

Although this site is located within a Flood zone 1, it is earmarked for a residential led, mixed use development split into three separate sites, consisting of residential and business floorspace. Therefore, the site is not suitable for the proposed development.

3.4. Site SA3A: Crown Trading Estate, with the potential capacity for 197 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development with small scale commercial uses at ground floor level. Therefore, the site is not suitable for the proposals.

3.5. Site SA4: 25 – 39 Fairview Business Centre, with the potential capacity for 260 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development with small scale commercial uses at ground floor level. Therefore, the site is not suitable for the proposals.

3.6. Site SA5: Land to the south of railway including Nestle, with the potential capacity for 1800 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development. The site is split into three segments, with two outlined for residential and the other consisting of a residential building with small scale commercial uses at ground floor level. Therefore, the site is not suitable for the proposals.

3.7. Site SA6: Golden Cross Public House, with the potential capacity for 23 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous residential planning permission granted. Therefore, the site is not suitable for the proposals.

3.8. Site SA7: Union House, Hayes, with the potential capacity for 46 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous residential planning permission granted. Therefore, the site is not suitable for the proposals.

3.9. Site SA8: Olympic House, 1a Grove Lane, with the potential capacity for 9 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous residential planning permission granted. Therefore, the site is not suitable for the proposals.

3.10. Site SA9: Audit House and Bellway House, Eastcote, with the potential capacity for 47 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous residential planning permission granted. Therefore, the site is not suitable for the proposals.

3.11. Site SA10: 269-285 Field End Road, Eastcote, with the potential capacity for 23 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and adequate landscaping, with previous residential planning permission granted. Therefore, the site is not suitable for the proposals.

3.12. Site SA11: Charles Wilson Engineers, Uxbridge Road, with the potential capacity for 34 - 43 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development with adequate parking and landscaping areas. Therefore, the site is not suitable for the proposals.

3.13. Site SA12: Former Allotments and Melrose Close Car Park, Burns Close, with the potential capacity for 83 dwellings

Although this site is located within a Flood zone 1, it is listed for a mixed-housing residential development with adequate landscaping and parking. Therefore, the site is not suitable for the proposals.

3.14. Site SA13: Royal Quay, Summerhouse Lane, with the potential capacity for 87 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning history for residential refurbishments and/or flat conversion. Therefore, the site is not suitable for the proposals.

3.15. Site SA14: Master Brewer, and Hillingdon Circus, Hillingdon, with the potential capacity for 390 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development., with previous planning permission for a retail/residential mixed-use development. Therefore, the site is not suitable for the proposals.

3.16. Site SA15: Royal Mail Sorting Office, Park Way, Ruislip Manor, with the potential capacity for 22 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.17. Site SA16: Northwood Station, Green Lane, with the potential capacity to be determined by design

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.18. Site SA16A: 36-40 Rickmansworth Road, Northwood, with the potential capacity for 21 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous residential planning permission. Therefore, the site is not suitable for the proposals.

3.19. Site SA17: 42-46 Ducks Hill Road, Northwood, with the potential capacity for 7 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.20. Site SA18: West End Road, South Ruislip, with the potential capacity for 30-44 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development. Therefore, the site is not suitable for the proposals.

3.21. Site SA19: Braintree Road, South Ruislip, with the potential capacity for 163 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.22. Site SA20: Bourne Court, South Ruislip, with the potential capacity for 69 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.23. Site SA22: Chailey Industrial Estate, Pump Lane, Hayes, with the potential capacity for 198 dwellings & additional Site B TBD

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.24. Site SA23: Silverdale Road, Western View, Hayes, with the potential capacity for 363 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.25. Site SA24: Benlow Works, with the potential capacity for 36 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development. Therefore, the site is not suitable for the proposals.

3.26. Site SA25: 297-299 Long Lane, Hillingdon, with the potential capacity for 33 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.27. Site SA26: High Street/Bakers Road, Uxbridge, with the potential capacity to be determined by design

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.28. Site SA27: St Andrews Park – Annington Homes, with the potential capacity for 330 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development. Therefore, the site is not suitable for the proposals.

3.29. Site SA28: St Andrews Park, Uxbridge, with the potential capacity for 1340 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.30. Site SA29: Cape Boards, Iver Lane, Cowley, with the potential capacity for 315 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.31. Site SA30: Grand Union Park, Packet Boat Lane, with the potential capacity for 251 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission approval for a residential development. Therefore, the site is not suitable for the proposals.

3.32. Site SA31: Fassnidge Memorial Hall, Uxbridge, with the potential capacity for 80 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.33. Site SA31A: Waterloo Wharf, Uxbridge, with the potential capacity for 52 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.34. Site SA31B: Randalls Building, Uxbridge, with the potential capacity for 58 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.35. Site SA32: Former NATS Site, Porters Way, West Drayton, with the potential capacity for 775 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.36. Site SA33: Kitchener House, Yiewsley, with the potential capacity for 23 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.37. Site SA34: The Blues Bar, Yiewlsey, with the potential capacity for 38 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.38. Site SA34A: Former West Drayton Police Station, with the potential capacity for 53 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.39. Site SA34B: Former British Legion Building, Station Road, with the potential capacity for 13 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.40. Site SA35: Former Vehicle Testing Station, Cygnet Road, Hayes, with the potential capacity for 84 - 92 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development. Therefore, the site is not suitable for the proposals.

3.41. Site SA36: Hayes Bridge, Uxbridge Road, with the potential capacity for 40 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.42. Site SA37: Former Coal Depot, Tavistock Road, with the potential capacity for 168 - 189 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development and therefore not suitable for the proposals.

3.42. Site SA38: Padcroft Works, Tavistock Road, with the potential capacity for 415 dwellings & additional sites TBD

Although this site is located within a Flood zone 1, it is listed for a residential led development. Therefore, the site is not suitable for the proposals.

3.43. Site SA39: Trout Road, Yiewsley, with the potential capacity for 217 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for a residential led mixed-use development. Therefore, the site is not suitable for the proposals.

3.44. Site SA39A: Land to the Rear of 2-24 Horton Road, with the potential capacity for 86 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.45. Site SA40: 26-36 Horton Road, Yiesley, with the potential capacity for 50 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for residential use. Therefore, the site is not suitable for the proposals.

3.46. Site SA41: 21 High Street Yiewsley, with the potential capacity for 51 dwellings

Although this site is located within a Flood zone 1, it is listed for a residential led development, with previous planning permission granted for a residential led mixed-use development. Therefore, the site is not suitable for the proposals.

Hillingdon Local Plan: Rebalancing Employment Land – Policy SEA

2: Hotel and Office Growth Locations

Highlighted within the London Borough of Hillingdon Local Plan is Policy SEA 2: Hotel and Office Growth Locations, which designates specific areas of priority for office and hotel developments across the Borough.

In accordance with the evidence gathered by the council, the following two locations were determined as primary areas for hotel development, and can be seen in the figures overleaf:

- Uxbridge Town Centre – defined by the area shown in Figure 2;
- Hayes Town Centre – defined by the area shown in Figure 3.

The proposed development site of 233 High Street, Uxbridge can also be seen marked in Figure 2, and clearly shows that it lies within the Uxbridge Town Centre designated area for development.

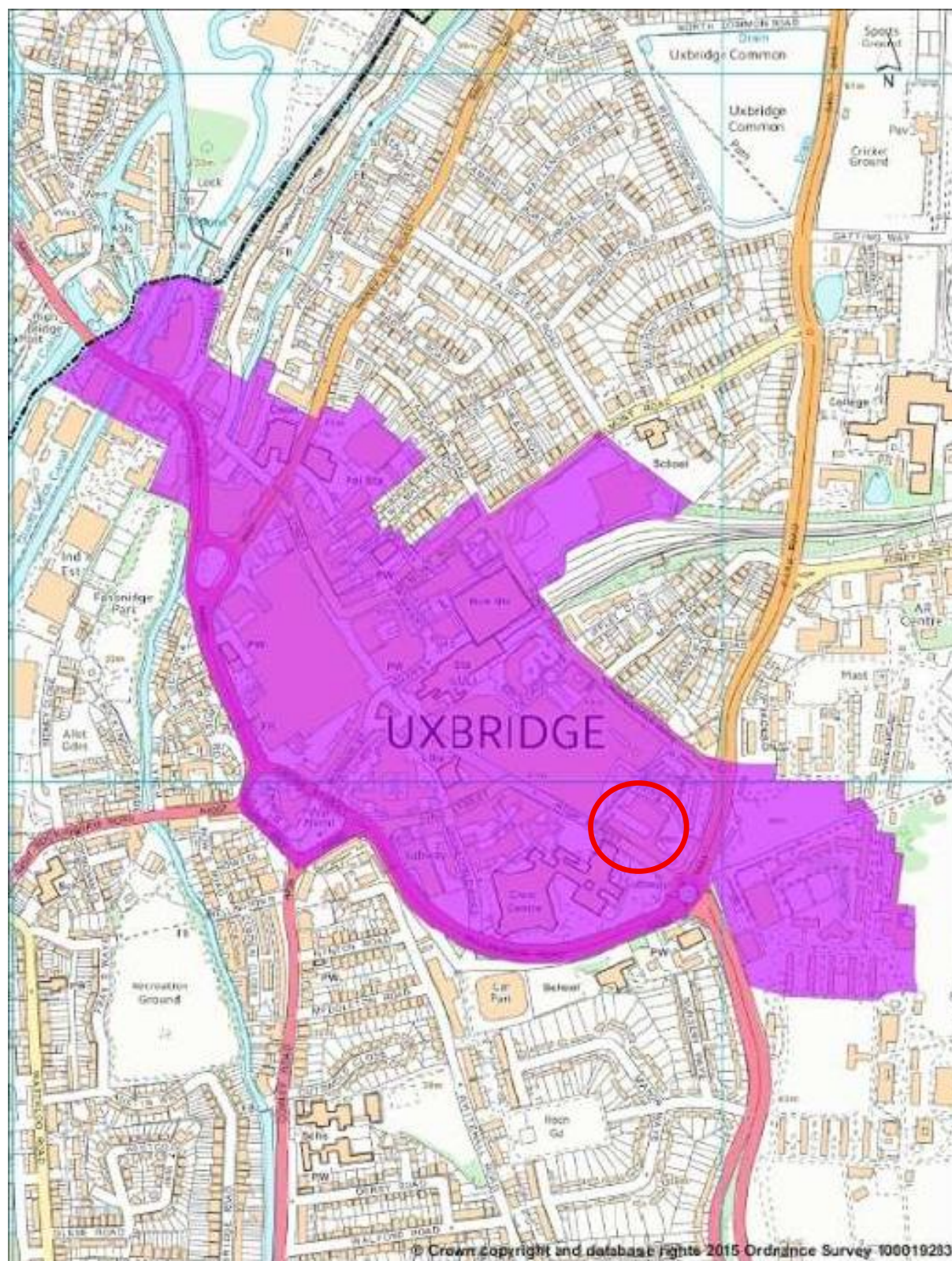


Figure 2 – Uxbridge Town Centre Hotel & Office Growth Location – Extracted from London Borough of Hillingdon Local Plan

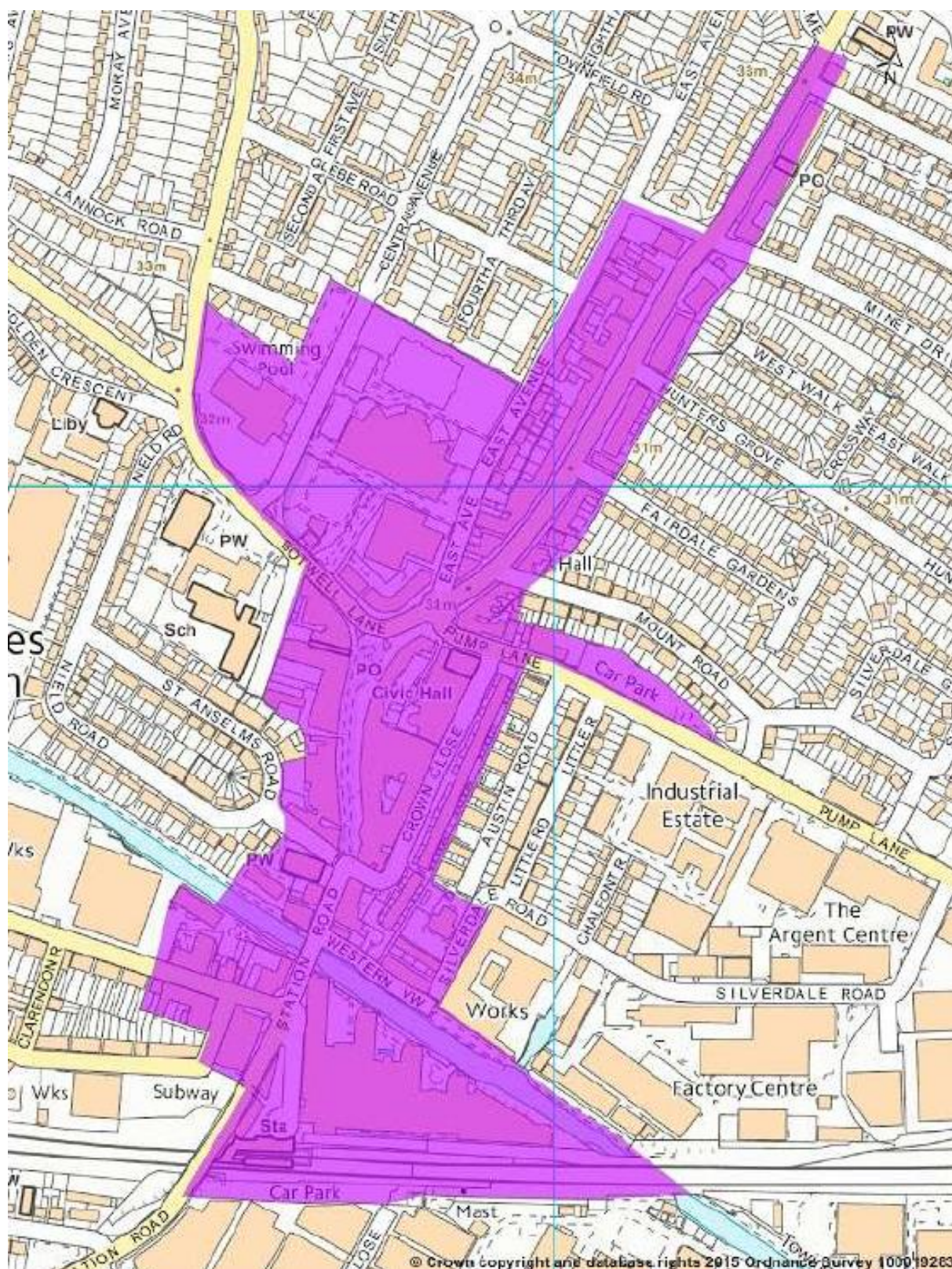


Figure 3 – Hayes Town Centre Hotel Growth Location – Extracted from London Borough of Hillingdon Local Plan

Brownfield Registered Sites

As of the time of writing this report, there are no available sites listed as currently available on the Hillingdon Brownfield Register. Sites listed as having planning permission granted have been considered as unavailable. The remaining available sites are stated in the Hillingdon Local Plan, and therefore have already been discussed in the section above.

The Current Hillingdon Brownfield Land Register can be found at:

<https://www.hillingdon.gov.uk/article/5526/Brownfield-Land-Register>

4. WINDFALL SITES

The following sites consist of a review of the land for sale, based on findings from the internet, in order to apply the sequential test to windfall sites.

In order to find these sites, the following key words/phrases were inputted into the google search engine:

- Development Land for Sale Spelthorne
- Development Land for Sale Spelthorne, residential use
- Land for sale Spelthorne

The above searches resulted in links to the following websites:

[Land For Sale In Hillingdon | OnTheMarket](#)

[Land for Sale | Hillingdon Council](#)

[Land for Sale in Hillingdon | Rightmove](#)

[Commercial & Development Land for Sale in Hillingdon | Savills](#)

4.1 Chiltern View Road, Uxbridge

Price: £310,000

Size: 371m²

Although the site is located within a Flood Zone 1, it is too small for the proposed development and has full planning permission for the erection of a four bedroom bungalow. Therefore, it is not suitable to accommodate the proposed development.



4.2 Butler Street, Uxbridge

Price: £100,000

Size: Not Stated

Although the site is located within a Flood Zone 1, it is too small for the proposed development, and marketed for a single residential building. Therefore, the site is not suitable for the client's proposals.



4.3 Springwell Lane Rickmansworth, WD3

Price: £20,000

Size: Approx. 1000m²

This site is located within a Flood Zone 3 and is only a third of the size of the proposed development site. It is located adjacent three lakes and the Grand Union Canal, which would provide some extensive restrictions and also located within Greenbelt land. The land is also located out with the preferred Hotel & Office Development areas previously listed in the above section. Therefore, the site is not suitable for the proposed development.



4.4 Hatch Lane, Heathrow, West Drayton, UB7

Price: £20,000

Size: 162m²

Although the site is located within a Flood Zone 1, it is too small of the proposed development. The site is located next to the Skyport Trade Park, and near Heathrow Airport. The land is also located out with the preferred Hotel & Office Development areas previously listed in the above section. Therefore, the site is not suitable for the proposed development.



4.5 Uxbridge, Greater London, UB10

Price: £25,000

Size: 170m²

Although the site is located within a Flood Zone 1, it is significantly smaller than the proposed development site. The parcel of land is irregularly shaped, and would not be suitable for the erection of a hotel of any significant capacity. The land is also located out with the preferred Hotel & Office Development areas previously listed in the above section. Therefore, the site is not suitable for the proposed development.



4.6 Bath Road, Hounslow

Price: £1,800,000

Size: Approx. 650m²

Although the site is located within a Flood Zone 1, it is too small of the proposed development. The site is currently operating as a vehicle garage, and has planning permission to raise the building height by 5m. The land is also located out with the preferred Hotel & Office Development areas previously listed in the above section. Therefore, the site is not suitable for the proposed development.



4.7 Flamborough Road, Ruislip, Hillingdon, HA4 0DL

Price: £100,000

Size: Approx. 117m²

Although the site is located within a Flood Zone 1, it is significantly smaller than the proposed development site, and would not be suitable for the erection of a hotel of any significant capacity. The land is also located out with the preferred Hotel & Office Development areas previously listed in the above section. Therefore, the site is not suitable for the proposed development.



5. CONCLUSION

A Sequential Test was completed for the proposed change of use of the former regal cinema to a banqueting suite, and construction of a new four-storey hotel at 233 High Street, Uxbridge, UB8 1LD. Nearby sites allocated for use in the Hillingdon Local Plan, Brownfield Register, and Windfall Sites were assessed in order to confirm that the proposed development has been steered towards the lowest flood risk area, and that sites which are located within Flood Zone 1 extents, are not suitable.