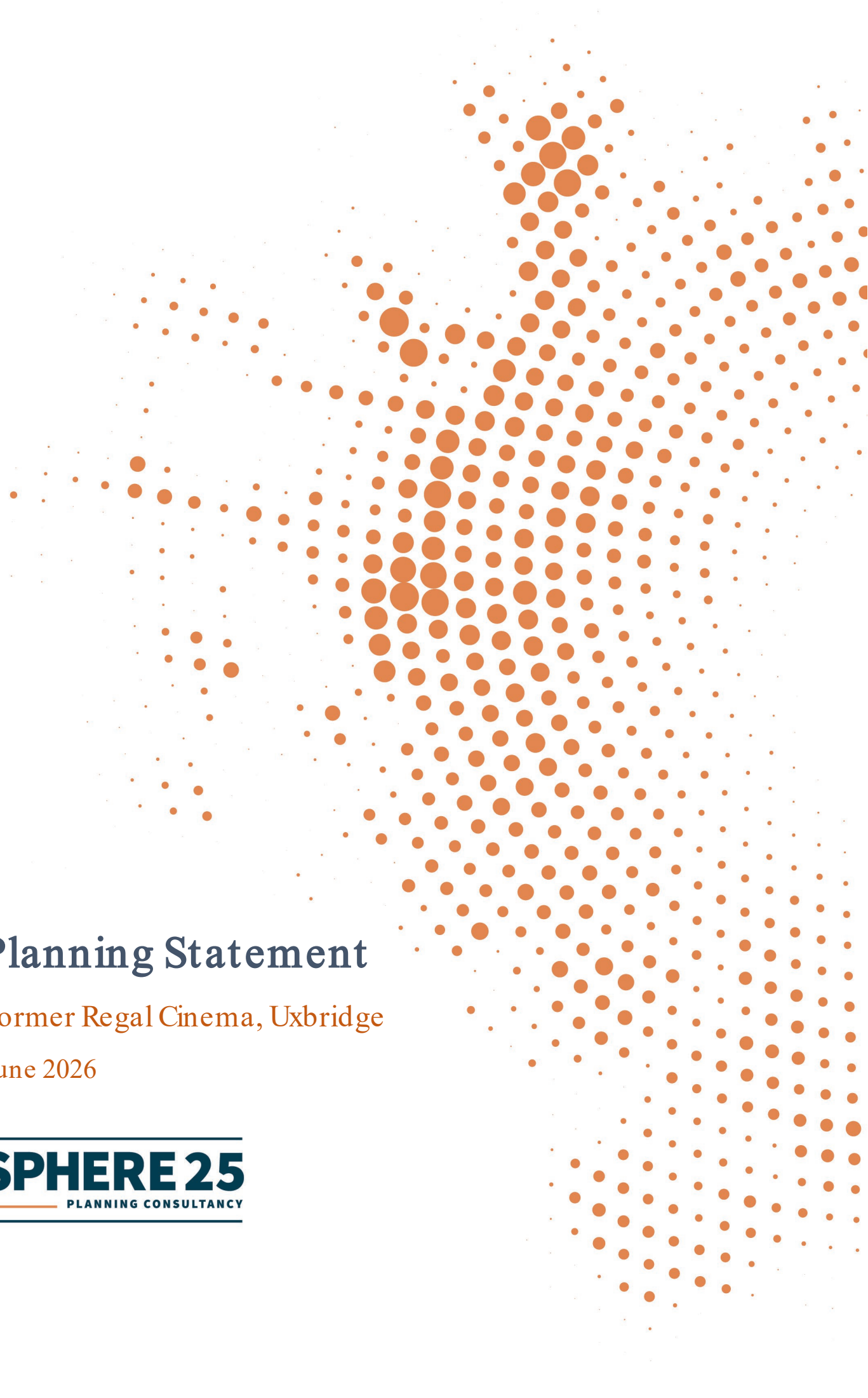




Planning Statement

Former Regal Cinema, Uxbridge

June 2026



Contents

1. Introduction	2
2. The Site and its Context	4
3. Planning History	6
4. Pre-Application Engagement	10
5. Application Proposals	12
6. Planning Policy Context	16
7. Planning Assessment	29
8. Planning Benefits	42
9. Previous Planning Application	44
10. Summary & Conclusion	48

- 1.1 This Planning Statement has been prepared by Sphere25 on behalf of Frough Ltd (the ‘Applicant’). This Planning Statement supports an application for full planning permission and listed building consent for a change of use of the existing building to a banqueting suite and the development of a four storey hotel (the ‘Proposed Development’) at the Former Regal Cinema, 233 High Street, Uxbridge, UB8 1LD (the ‘Site’).
- 1.2 The application seeks to change the use of the existing nightclub (Sui Generis) to a banqueting suite (Sui Generis) and develop a new four storey hotel (Use Class C1). The description of the development is as follows;

“Change of use of existing nightclub (Sui Generis) to a banqueting suite (Sui Generis) and development of a hotel (Use Class C1) including the change of use of existing gymnasium (Use Class E) and associated landscaping, car, and cycle spaces (Part retrospective)”

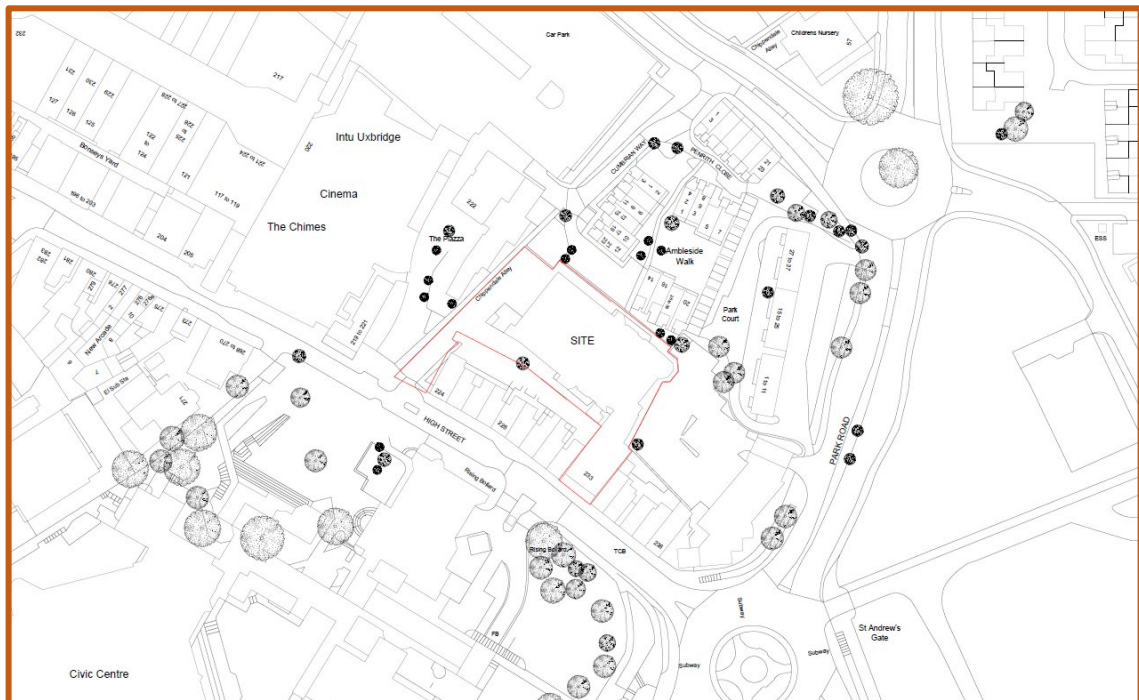


Figure 1: Site Location Plan (Source: Nick Willson Architects)

Format of Submission

- 1.3 The planning application submission is accompanied by a package of supporting information. In this document, reference will be made, where appropriate, to the conclusions and details contained within these supporting documents.

- 1.4 This Planning Statement should be read in conjunction with the documents and plans submitted for approval, which are set out in the submitted Cover Letter. These follow the validation requirements as set out in the pre-application response dated 04 April 2025 and documents submitted/requested as part of the recent planning application. A list of drawing numbers has also been provided within the Covering Letter.

Structure of the Planning Statement

- 1.5 The purpose of this Planning Statement is to set out the planning rationale that underpins the planning application and to demonstrate its acceptability in planning terms. This Statement is structured as follows:
- 1.6 Section 1 provides an **Introduction** to the Planning Application.
- 1.7 Section 2 describes the **Site and its Context**. This section outlines the site uses as well as the physical features and surrounding land uses that characterise the site and wider area.
- 1.8 Section 3 provides the **Planning History**. This sets out the site planning history and associated surrounding planning history.
- 1.9 Section 4 outlines the **Pre-Application Engagement**, including engagement with the local authority.
- 1.10 Section 5 describes the **Application Proposals**. This includes references to design, scale, heritage, and other detailed specifications of the scheme.
- 1.11 Section 6 sets out the **Planning Policy Context**. Here, relevant national, regional, and local planning policies are outlined. This section explains the policy framework against which the application will be considered.
- 1.12 Section 7 provides a **Planning Assessment** of the proposals. This section begins with the principle of development and then considers the appropriateness of the applications characteristics. This includes use, scale, and landscaped space amongst other principles.
- 1.13 Section 8 summarises the key **Planning Benefits** of the proposal. This includes the retention and re-use of a heritage asset amongst other benefits
- 1.14 Section 9 sets out a review of the **Previous Planning Application**, noting changes that have been made alongside further data collated since the previous application to respond to the schedule of reasons for refusal set out in the decision notice.
- 1.15 Section 10 sets out a short **Summary and Conclusion** of this Planning Statement.

2. The Site and its Context

Site Description

- 2.1 The application site occupies a prominent location on the western side of Uxbridge High Street, situated within a varied commercial frontage that includes a mix of ground-floor retail and upper-floor residential units. The building itself is L-shaped in plan, with a highly recognisable street-facing elevation featuring a glazed upper façade, decorative canopy, and original entrance, once serving as the main access point to the former cinema.
- 2.2 The bulk of the building extends to the rear, set behind the terraced buildings that line the High Street. This includes the former main auditorium and associated spaces, linked to the High Street via the front entrance wing.
- 2.3 The building previously operated a cinema from its opening in 1931 to 1977. Since then, the building has undergone a series of changes of use, including into a nightclub, gym, and snooker hall (which remains on the first floor fronting Uxbridge High Street). While the required alterations were made over time, many original architectural and decorative features have survived and continue to contribute positively to the site's architectural significance. The application site also includes a parcel of vacant land used as a car park, formerly associated with the building's gym use.
- 2.4 At present, the building is largely vacant, with the exception of an operating snooker hall on the first floor of the High Street frontage, which, while within the red line boundary, does not form part of this planning application.

Access

- 2.5 The site is situated within a highly sustainable area, benefitting from a PTAL 6a. The site benefits from direct frontage onto Uxbridge High Street, a key vehicular and public transport corridor within the town centre. The High Street in this location operates two-way traffic and serves multiple bus routes, with up to six services passing the site in either direction during peak periods, offering excellent public transport accessibility.
- 2.6 Vehicular access to the site is predominantly taken from the south of the site along High Street with access also used for commercial/residential properties facing High Street. Further access can be gained from Cumbrian Way to the north of the site noting the site's ownership connects with land owned by The Mayor and Burgesses of the London Borough of Hillingdon (Title Number NGL483153).
- 2.7 The site is highly accessible by sustainable modes, including bus, walking, and cycling, and lies within a town centre location with excellent public transport links. Uxbridge Train Station is situated approximately 0.4 miles from the site (approximate 9 minute walk) serving the Metropolitan and Piccadilly lines. The closest bus stop is situated along High Street

approximately 1 minute walk serving a range of day and night buses towards Uxbridge and Ruislip. Other bus services within a 200 metres radius from the site provide bus services to Stockley Park, Heathrow Airport, and Southall amongst others.

- 2.8 Therefore, car parking provision is proposed to be minimal but in accordance with the relevant planning policy. The development will focus on facilitating pedestrian access via the High Street and provide sufficient space for servicing and emergency vehicles in front of the hotel and banqueting suite utilising a similar arrangement as current used.

Heritage Designations

- 2.9 The application site is located adjacent to the Old Uxbridge/Windsor Street Conservation Area designated to preserve the historic character and architectural interest of Uxbridge's civic and commercial core. The conservation area is characterised by early 20th-century civic architecture, traditional commercial frontages, and cohesive historic streetscapes.
- 2.10 The former Regal Cinema (ref. 1080111 – Grade II*) was originally listed as Grade II upon its closing in 1977, but was later upgraded to Grade II* in November 2000. Opened in 1931, the building is a stunning example of 1930's Art Deco style, designed by renowned cinema architect, E. Norman Bailey. It features unique Egyptian motifs in its façade, creating a prominent architectural frontage into the nearby conservation area.
- 2.11 Within a 100 metre study area of the site, several additional heritage assets have been identified that may be sensitive to changes in setting or visual character. These include historically listed buildings Discotheque Royale (ref. 1080111 - Grade II*), Hillingdon Civic Centre (ref. 1451218 - Grade II), The Shrubbery (ref. 1080174 - Grade II), Norman Reeves Motors (ref. 1080173 - Grade II), 274 High Street (ref. 1180711 - Grade II), and the Old Uxbridge and Windsor Street Conservation Area. The relationship between the proposed development and these assets has been carefully considered to ensure the scheme responds sensitively to the surrounding historic environment.

Immediate Context

- 2.12 Approximately 150 metres to the west of the site is the Chimes Shopping Centre, and within 400 metres west is Uxbridge Train Station, serviced by the Metropolitan and Picadilly lines. To the south of the cinema plot sits the listed Hillingdon Civic Centre, composed of traditional red brick laid out in irregular patterns, enhancing the area's visual appeal.
- 2.13 The eastern sides of the plot are primarily mixed-use retail with upper floors for residential, and to the north are entirely residential buildings that utilise various typologies such as flats and terraced housing, also composed of traditional red brick as well as mock Tudor. The north-eastern corner of the High Street contains a currently unoccupied office building with a private car park.

3. Planning History

Site Planning History

3.1 The most relevant planning history can be viewed in Figure 2 below:

Application Reference	Description of Development	Status
3638/APP/2025/2108	Change of use of existing nightclub (Sui Generis) to a banqueting suite (Sui Generis) and development of a hotel (Use Class C1) including the change of use of existing gymnasium (Use Class E) and associated landscaping, car and cycle spaces (Part retrospective)	Refusal 15.04.2026
3638/APP/2025/1231	Details pursuant to Conditions 3 (conservation supervision), 4 (protection of interior features), 5 (protection of cinema organ) and 12 (construction management plan) of Listed Building Consent reference: 3638/APP/2025/511 (New level floor to the cinema and hall; New replacement upper mezzanine floor with two tiers; New feature staircase and access ramp, stairs; Repairing of the damaged plaster works, skirting and features; New metal guarding and railing/handrails; New hall side entrance area steps and landings; BOH upper rooms to the cinema rear refurbished and made good with new doors, finishes; Removal of the stair wall and curved dividing walls in the main lobby; New replacement slimline heritage windows to the rear elevations).	Approval 27.05.25
3638/APP/2025/511	New level floor to the cinema and hall; New replacement upper mezzanine floor with two tiers; New feature staircase and access ramp, stairs; Repairing of the damaged plaster works, skirting and features; New metal guarding and railing/handrails; New hall side entrance area steps and landings; BOH upper rooms to the cinema rear refurbished and made good with new doors, finishes; Removal of the stair wall and curved dividing walls in the main lobby; New replacement slimline heritage windows to the rear elevations. (Application for Listed Building Consent)	Approval 25.02.2025

3638/APP/2024/1838	Removal of nightclub fixtures and fittings, including banquette seating, bar areas, railings, staircases, WCs and elements of the mezzanine and balcony. Dismantling and excavation of the nightclub flooring including ramps, staircases and a dance floor. Re-installation of a level floor above the existing cinema floor in the auditorium. A new replacement upper mezzanine floor with a feature staircase and lift. Installation of a new food preparation area and accessible WC below the mezzanine level (Application for a part retrospective Listed Building Consent).	Refusal 09.07.2024
3638/APP/2016/4436	Refurbishment involving exterior redecoration below canopy level and interior redecoration, removal of non-structural partitions and removal of redundant masonry pier (Application for Listed Building Consent).	Approval 09.12.2016
3638/APP/2006/1893	Internal alterations to a Grade II* listed building, including new balustrades, new dance podium, rearrangement of existing seating/ steps/ bars/ dance floor, glazed screens (x2), new DJ booth, new seating, new disabled ramps, new and rearranged toilet facilities, lift, and lighting structure and circular projection screen to be suspended from ceiling (application for listed building consent).	Approval 22.01.2007
3638/BT/93/0800	Internal alterations to provide extended bar into upper storerooms of adjacent Night Club (Application for Listed Building Consent)	Approval 05.10.93
3638/BF/89/0049	Internal alterations and alteration to main entrance (Application for Listed Building Consent)	Approval 03.03.1989
3638/BE/88/2865	Internal alterations to change existing kiosk into a bar (Application for Listed Building Consent)	Approval 03.03.1989
3638/AQ/86/2150	Listed building consent to dev/alter (P)	Approval 23.01.1987
3638/AK/85/0406	Change of use to Retail use 133sq.m.(P)	Approval 11.06.1985
3638/AG/84/1818	Listed building consent to dev/alter (P)	Approval 05.08.1985

Figure 2 – Relevant Planning Applications

Surrounding Planning History

- 3.2 The site's surrounding area has been subject to several relevant planning applications. Those of relevance have been accessed on the online planning portal for the London Borough of Hillingdon and are set out in Figure 3.

Application Reference and Address	Description of Development	Status
585/APP/2024/1879 ST ANDREWS PARK HILLINGDON ROAD UXBRIDGE	Hybrid planning application comprising: Outline planning permission (with all matters reserved) for residential development and commercial uses, to be occupied flexibly within Use Classes E(a), E(b), E(c), E(e), E(g)(i), E(g)(ii) and a convenience store (Use Class E(a)); plus car parking, hard and soft landscaping, and all other associated works; Plus, full planning permission for reinstatement of gym use (Use Class E(d)) and change of use to provide a cafe (Use Class E(b)) within the former cinema building; and external alterations; and associated car parking, hard and soft landscaping and all other associated works.	Undecided
8708/APP/2024/2863 127-128 HIGH STREET UXBRIDGE	Change of Use from Use Class E (Commercial, Business and Service) to Sui Generis (Drinking Establishment), including creation of a rear smoking area, and internal alterations with removal of glass from shopfront and replacing with toughened glass, installation of new external front lighting, and repairs to shopfront with painted finish and new roof to existing dormer. (Related to Listed Building Consent application ref. 8708/APP/2024/2864)	Approval 17.04.2025
8708/APP/2024/2864 127-128 HIGH STREET UXBRIDGE	Change of Use from Use Class E (Commercial, Business and Service) to Sui Generis (Drinking Establishment), including creation of a rear smoking area, and internal alterations with removal of glass from shopfront and replacing with toughened glass, installation of new external front lighting, and repairs to shopfront with painted finish and new roof to existing dormer	Approval 17.04.2025

	(Application for Listed Building Consent) (Related to planning application ref. 8708/ APP/2024/2863)	
9423/ APP/2025/215 BOOTS THE CHEMIST,163 HIGH STREET UXBRIDGE	Shopfront alterations, including signage, fascia/shopfront decoration, replacement awning fabric and internal alterations (Application for Listed Building Consent)	Approval 31.03.2025
9423/ APP/2025/ 121 BOOTS THE CHEMIST,163 HIGH STREET UXBRIDGE	Installation of external plant and internal alterations (Application for Listed Building Consent)	Approval 31.03.2025
4403/ APP/2024/3192 18 HIGH STREET UXBRIDGE	Change of use of ground floor from Office/Financial Services (Class E) to Restaurant (Class E) including internal alterations to the layout with the erection of partition walls and installation of a kitchen (Associated with Listed Building Consent application ref: 4403/ APP/2024/3193)	Approval 17.03.2025
4403/ APP/2024/3193 18 HIGH STREET UXBRIDGE	Change of use of ground floor from Office/Financial Services (Class E) to Restaurant (Class E) including internal alterations to the layout with the erection of partition walls and installation of a kitchen (Application for Listed Building Consent, associated with planning application ref: 4403/ APP/2024/3192)	Approval 17.03.2025

Figure 3 – Surrounding Planning Applications

4. Pre-Application Engagement

Introduction

- 4.1 This section provides an overview of the pre-application and full application discussions and engagement with Hillingdon Council.
- 4.2 The submitted proposals have addressed concerns raised throughout both the pre-application process and full application, where feasible, and any relevant rationale in response to comments raised can be found in Section 7 of this Planning Statement.

London Borough of Hillingdon Pre-Application

- 4.3 A formal pre-application request was submitted to the London Borough of Hillingdon, and a meeting was held on 14 February 2025. The pre-application scheme proposed the change of use of the listed former Regal Cinema to a banqueting suite, along with the erection of a four-storey hotel incorporating the site of a former gym.
- 4.4 The Council acknowledged the scheme's potential to deliver public benefits, particularly the re-use and restoration of a vacant Grade II* listed heritage asset. Officers were broadly supportive of bringing the building back into use, subject to careful design and justification of key elements.
- 4.5 A key matter identified was the need for a robust justification for the loss of the former nightclub use, due to policy support for night-time economy functions within town centres.
- 4.6 The proposed design and heritage approach was broadly supported, with encouragement to retain and restore original Art Deco features and enhance the façade and internal spaces. Further information was requested on materials, finishes, and the building's internal layout.
- 4.7 Officers raised comments regarding amenity, particularly around potential noise, odour, and overlooking from the proposed roof garden. These have been addressed through removing the proposed roof terrace from the proposals, alongside the submission of technical reports in support of the application.
- 4.8 Highways and servicing were key issues, with officers highlighting the need for a full Transport Assessment, parking strategy, servicing arrangements, and delivery management to avoid congestion on Uxbridge High Street.
- 4.9 The Council concluded that, subject to addressing the identified issues and submission of additional information, the proposal could be supported.

Previous Full Application

- 4.10 A full application (ref. 3638/APP/2025/2108) was submitted on 06 August 2025 and refused on 15 April 2026, due to issues related to The following reasons:

- Impacts to highway network resulting in traffic congestion, parking stress, and harm to highway safety.
 - Failure to demonstrate satisfactory provision made to management of surface water drainage according with London Plan hierarchy and unacceptable flood risk / drainage impacts.
 - Failure to demonstrate that the basement would maintain structural stability of the Grade II* Listed Building and neighbouring properties.
 - Failure to secure Section 106 Planning Obligations.
 - Insufficient details provided to demonstrate mitigation measures for odour pollution would not cause detrimental impacts to the Grade II* Listed Building.
 - Failure to demonstrate that development would not create unacceptable detrimental impact on amenity of neighbouring occupiers resulting from noise from its operation.
- 4.11 The current application responds to these concerns through the elimination of the basement, relocation of accessible parking, change in access approach, clarification of odour mitigation measures, provision of traffic management details, and provision of noise mitigation measures.
- 4.12 Further details of the changes made to the proposal in response to the Schedule of Reasons given on 15 April 2026 are set out in the **Previous Planning Application** section of this Planning Statement.

Summary

- 4.13 The proposals submitted within this application have strived to address the feedback received both during the initial pre-application stage and after the recent full planning application. The scheme as currently submitted has significantly improved due to the discussions held, which have positively influenced the proposal changes.
- 4.14 It is also noted that throughout pre-application engagement, comments were raised in regard to minor heritage matters internal to the cinema building. These were subsequently addressed in the Listed Building Consent application (Ref. 3638/APP/2025/511) which was approved on 24 April 2025. This current application will primarily consider the change of use of the existing building alongside the hotel development when factoring in any heritage impacts.
- 4.15 Further details of how the submitted scheme has addressed the comments raised can be found within this Planning Statement, Design and Access Statement, and supporting technical information.

5. Application Proposals

Introduction

- 5.1 This section provides an overview of the planning application and its specifications. This includes key parameters relating to use, scale, design, landscaping, sustainability, and parking/highways.

Description of Development

- 5.2 The proposed description of development is:

“Change of use of existing nightclub (Sui Generis) to a banqueting suite (Sui Generis) and development of a hotel (Use Class C1) including the change of use of existing gymnasium (Use Class E) and associated landscaping, car, and cycle spaces (Part retrospective)”

Design, Layout, and Appearance

- 5.3 This proposal seeks permission for the refurbishment and extension of the existing Grade II* listed cinema building to accommodate a 31-room hotel with integrated banqueting and hospitality facilities as well as allocated car parking provision situated within the nearby Chimes Car Park (details of the agreement have been provided with this application). The overarching objective is to secure a sustainable and viable long-term future for the building, while conserving and enhancing its historic and architectural significance. The scheme incorporates underused internal areas, including the former gym and music rooms, by repurposing them for hotel-related functions, and introduces a sensitive extension to the west that provides additional hotel accommodation in a manner sympathetic to the heritage asset.
- 5.4 The proposal is rooted in a heritage-led approach, aiming to restore and celebrate original features such as the entrance canopy, internal plaster detailing, and decorative elements within the music rooms. As many of the original features as possible will be retained, seeking to incorporate them into the development to encourage guests to enjoy the building's unique heritage.
- 5.5 The refurbishment works are carefully designed to preserve the special interest of the cinema building. The original entrance foyer and staircases will be restored to their former condition, reinstating the building's historic character. Externally, the street-facing façade, including original windows and the entrance canopy, will be repaired and reinstated using traditional materials and techniques that match the existing construction.
- 5.6 Internally, the cinema space will be conserved, with panelling, ceiling details, and lighting fixtures repaired and redecorated to reflect the original palette and finish as per the approved Listed Building Consent. The historic music rooms, including the organ and associated

decorative plasterwork, will be sensitively conserved and showcased as part of the hotel's public areas, enhancing their visibility and heritage value. The unused gym spaces will be repurposed to support hotel uses, with any new openings formed in a way that respects the historic fabric. The rear and ancillary areas of the building will be converted for back-of-house hotel functions, ensuring the building operates efficiently while minimising physical interventions.

- 5.7 The proposed hotel extension will be located to the west of the existing cinema structure, comprising 31 rooms for guests across four floors, utilising a currently empty and unused area. The extension has been deliberately designed to sit lower than the main cinema block and is set back from the street, thereby reducing its visual impact and preserving key views and prominence of the listed building. The new hotel would also only be visible momentarily when walking along Uxbridge High Street and would not be visible when enjoying the main Regal Cinema building façade.
- 5.8 Architecturally, the extension is designed to complement the cinema building, utilising high-quality materials such as stone, terrazzo, white render, and finely detailed metal glazing. A glazed link is proposed between the original and new building, ensuring a clear distinction between old and new while maintaining respect for the original brickwork and architectural composition. This connection reinforces the legibility of the historic structure and contributes to the overall coherence of the scheme.
- 5.9 The design of the refurbishment and extension has been shaped by an in-depth understanding of the building's historical and architectural significance. A thorough historical assessment, together with findings from watching briefs during the strip-out phases, has revealed original fabric and detailing which have directly informed the development of the proposals. Key heritage features uncovered, such as scalloped plasterwork, hexagonal motifs, and diagonal window treatments, have been incorporated into the design narrative, ensuring that new works are both respectful and referential.
- 5.10 The project reflects a heritage-led, design-conscious approach that aims to secure the building's preservation through adaptive reuse, even featuring it to encourage enjoyment by the public. By introducing compatible and contextually appropriate new uses, the proposals safeguard the building's future and ensure it remains an active and valued part of Uxbridge Town Centre.

Landscaping

- 5.11 The proposals also include a comprehensive landscaping scheme aimed at enhancing the setting of the listed building and contributing to the overall environmental and visual quality of the development. A key element of this approach is the introduction of a sedum green roof across the new hotel building. These living roofs will promote biodiversity, manage rainwater

runoff, and contribute to the ecological value of the site while providing a soft, visually recessive finish to the roofscape.

- 5.12 To the west of the new extension, a landscaped buffer zone is proposed along the boundary with the existing side alley. This green strip will soften the built edge, offer visual relief, and provide a transition between the hotel extension and the adjacent context. The landscaping will be composed of shade-tolerant planting and integrated seating, contributing positively to the pedestrian environment.
- 5.13 On the southern side of the site, improvements to the public realm are proposed to reinforce the building's civic presence and enhance the arrival experience. These include the introduction of new high-quality stone paving, the planting of trees to provide shade and visual interest, and the installation of terrazzo steps that echo the materiality and design language of the original cinema building. This upgraded southern entrance aims to be both welcoming and functional, creating a legible and accessible threshold for hotel guests and members of the public.
- 5.14 The material palette for both the extension and the associated public realm has been carefully selected to reflect and complement the existing building. Wall treatments will include stone, terrazzo, and white render, referencing the cinema's original materials and finishes while ensuring a clean, contemporary appearance. Roof elements will incorporate a combination of sedum green roof and glazed components, balancing sustainability with visual lightness. Windows and doors across the new addition will be framed in metal, maintaining consistency with the detailing and proportions of the existing fenestration.

Access and Parking

- 5.15 In response to the concerns raised by planning officers of the impact on the structure of the building alongside suitable access to underground parking, the basement has been removed, and two accessible car parking spaces have been allocated externally to the front of the hotel area and banqueting suite. Additionally, this will be where servicing and delivery would take place as is currently occurring for commercial and residential properties along High Street..
- 5.16 Deliveries and servicing have been tracked and will be possible accessed from High Street. Further, pedestrian access will link the existing access at the rear of Cumbrian Way, just north of the site. This path will be landscaped, and will run to the rear entrance of the hotel into the glazed link and lobby.
- 5.17 10 cycle spaces will now be available at the front of the site to promote sustainable and active travel.

Heritage

- 5.18 During site investigations, a small room was identified to the rear of the former gym, adjacent to the main cinema space, containing what appears to be original cinema sound and lighting

control equipment. This includes elements of the historic “Western Electric system of sound apparatus,” believed to have supported the original cinema’s audio-visual operations. The equipment, which is in notably good condition, offers valuable insight into the technological and operational history of the building.

- 5.19 As part of the proposals, this room and its contents will be sensitively preserved and curated, with the introduction of a glazed frontage to create a visible display area with a suitable heritage text to be agreed and a QR code or web link attached to allow interested people to understand its importance. This has been secured as part of the recently approved Listed Building Consent application. This will allow guests and visitors to engage with a tangible part of the building’s heritage, further enhancing its cultural and interpretive value within the hotel environment.

6. Planning Policy Context

Introduction

- 6.1 This section summarises the key national, regional (London), and local (Hillingdon) policies against which the planning application will be determined. It will also consider other documents that constitute material planning considerations and may be referred to during the consideration of the planning application.
- 6.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications for development must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan relevant to this application includes:
- National Planning Policy Framework (2024)
 - London Plan (2021)
 - Hillingdon Local Plan Part 1 – Strategic Policies (2012)
 - Hillingdon Local Plan Part 2 – Development Management Policies (2020)
 - Hillingdon Local Plan Part 2 – Site Allocations and Designations (2020)
 - Other material considerations and supplementary planning documents
- 6.3 In addition, the National Planning Practice Guidance (NPPG) and Technical Housing Standards provide guidance at a national level and are important material considerations in the determination of planning applications. Furthermore, at a local level, Hillingdon have adopted a series of Supplementary Planning Documents (SPDs) which are also material considerations. Each of these documents are reviewed in more detail below.

National Planning Policy Framework (December 2024)

- 6.4 The National Planning Policy Framework (NPPF) is the principal document against which to assess applications for development in respect of national policy objectives and was revised in December 2024. At the heart of the NPPF remains the presumption in favour of sustainable development (paragraph 10).
- 6.5 The proposals accord with the NPPF's overriding objective of delivering sustainable development, and this should be given considerable weight in determining the application. **Paragraph 11** of the Framework advises that planning application decisions should apply a presumption in favour of sustainable development.
- 6.6 The NPPF considers sustainable development to have three dimensions: economic, social, and environmental. It confirms that the dimensions should be achieved jointly and

simultaneously and where this is demonstrable, development should be approved without delay.

- 6.7 **Chapter 4 ‘Decision Making’** states that local planning authorities should approach planning decisions in a positive and creative way, whilst also encouraging pre-application engagement to resolve issues early in the development of proposals. Additionally, it encourages Local Planning Authorities to work proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area.
- 6.8 **Chapter 6 ‘Building a strong, competitive economy’** explains that effort should be taken to create conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 6.9 **Chapter 7 ‘Ensuring the vitality of town centres’** ensures that councils support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 6.10 **Chapter 8 ‘Promoting Healthy and Safe Communities’** states that planning policies and decisions should aim to achieve healthy, inclusive, and safe places which promote social interaction, are safe and accessible, and enable and support healthy lives.
- 6.11 **Chapter 9 ‘Promoting Sustainable Transport’** directs new development to locations that are highly accessible by public transport, walking, and cycling, recognising that an integrated transport system is necessary to support a strong and prosperous economy. The NPPF seeks to actively manage patterns of growth to focus significant development towards locations which are, or can be, made sustainable, thereby reducing the need to travel.
- 6.12 **Chapter 11 ‘Making Effective Use of Land’** states policies should promote an effective use of land in meeting the need for homes and other uses. **Paragraph 125** confirms that local authorities should support development that makes efficient use of land, considering identified need, local market conditions, the availability and capacity for infrastructure and services, as well as the importance of securing well-designed, attractive, and healthy places.
- 6.13 **Chapter 12 ‘Achieving Well-Designed Spaces’** states that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creating better places in which to live and work and helps make development acceptable to communities.
- 6.14 **Chapter 16 ‘Conserving and enhancing the historic environment’** explains that historical assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

National Planning Practice Guidance

- 6.15 The National Planning Practice Guidance (NPPG), originally published online in March 2014, is a web-based resource providing material guidance for planning. It is a live document updated by the Department for Levelling Up, Housing, and Communities and forms a material consideration in planning application decisions.
- 6.16 Of particular relevance to this proposal is the section Historic Environment, specifically Paragraphs 015 and 020. Paragraph 015 outlines the importance of securing the optimum viable use for a heritage asset, emphasising that long-term conservation often relies on a sustainable, economically viable use that causes the least harm to the asset's significance. It recognises that while some uses may be more profitable, the preferred option should be the one that best preserves the asset's historic and architectural value.
- 6.17 Paragraph 020 discusses public benefits, which are a key consideration when weighing any harm to designated heritage assets. It highlights that public benefits may include sustaining or enhancing the significance of a heritage asset, reducing risks to its integrity, and securing its long-term future. Such benefits may be economic, social, or environmental in nature and need not always be publicly visible to be considered legitimate.

The London Plan (2021)

- 6.18 The London Plan was published in March 2021 and acts as a Spatial Development Strategy for Greater London. As the overall strategic plan for the capital, it sets out an integrated economic, environmental, transport, and social framework for the development of London over the next 20-25 years.
- 6.19 Policy GG1 'Building Strong and Inclusive Communities' ensures that all proposals are focused around building strong and inclusive communities. Amongst other strategic matters, Part B of the policy states that schemes should seek to ensure changes to the physical environment to achieve an overall positive contribution to London.
- 6.20 Policy GG2 'Making the Best Use of Land' targets those in planning and development to understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
- 6.21 Policy GG3 'Creating a Healthy City' focuses on improving the health of Londoner's and reducing health inequalities. This incorporates the promotion of active and healthy lifestyles; seeking to improve air quality; and increasing access to green space.
- 6.22 Policy GG5 'Growing a Good Economy' seeks proposals to promote and support London's rich heritage and cultural assets and its role as a 24-hour city.

- 6.23 Policy D2 'Infrastructure Requirements for Sustainable Densities' states a proposal's density should consider the provision of infrastructure and be proportionate to the site's connectivity to jobs and services.
- 6.24 Policy D3 'Optimising Site Capacity Through the Design-led Approach' ensures development is of the most appropriate form and land use for the site whilst ensuring consideration of design options to determine the most appropriate form of development that responds to a sites context and capacity for growth.
- 6.25 Policy D4 'Delivering Good Design' states that Design and Access Statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan. The design quality of development should be retained through to completion by ensuring maximum detail is provided, wording of the planning permission provides clarity, and avoiding deferring the assessment of design.
- 6.26 Policy D5 'Inclusive Design' states that development proposals should achieve the highest standards of accessible and inclusive design, that takes into account London's diverse population, provides high-quality spaces with no disabling barriers, and is able to be used with dignity for all.
- 6.27 Policy D8 'Public Realm' ensures that the public realm is well-designed, safe, accessible, well connected, related to local context, and easy to understand, service, and maintain. The policy goes on to outline how public realm should function and include design elements that respond to context and need.
- 6.28 Policy D10 'Basement Development' states that Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally.
- 6.29 Policy D11 'Safety, Security, and Resilience to Emergency' ensures that proposals maximise building resilience and minimise potential physical risks including those arising from extreme weather, fire, flooding, and related hazards. The policy states that developments should include measures to design out crime and these should be considered at the start of the design process.
- 6.30 Policy D12 'Fire Safety' states that all major developments should be submitted with a Fire Statement including a fire strategy produced by a third party suitably qualified assessor.
- 6.31 Policy D13 'Agent of Change' states that development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 6.32 Policy D14 'Noise' states that noise should be managed, mitigated, and minimised within the development.

- 6.33 Policy HC1 ‘Heritage Conservation and Growth’ ensures that development proposals affecting heritage assets, and their settings, conserves their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings.
- 6.34 Policy HC3 ‘Strategic and Local Views’ requires development proposals to be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.
- 6.35 Policy HC6 ‘Supporting the Night-time Economy’ explains that boroughs should develop a vision for the night-time economy, supporting its growth and diversification, in particular within strategic areas of night-time activity.
- 6.36 Policy G5 ‘Urban Greening’ states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of the site and building design by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage.
- 6.37 Policy G6 ‘Biodiversity and Access to Nature’ requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 6.38 Policy SI1 ‘Improving Air Quality’ ensures that development proposals do not lead to the deterioration of existing air quality. As a minimum, development proposals must be at least air quality neutral and utilise design solutions to prevent or minimise increased exposure to existing air pollution. Major developments should be submitted with an Air Quality Assessment and development proposals must also reduce impacts on air quality during construction and demolition.
- 6.39 Policy SI2 ‘Minimising Greenhouse Gas Emissions’ states that major developments should be net-zero carbon and should include a detailed Energy Strategy to demonstrate how this will be achieved. Major developments should achieve a minimum of 35% reduction beyond building regulations.
- 6.40 Policy SI3 ‘Energy Infrastructure’ states that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system following the heating hierarchy.
- 6.41 Policy SI4 ‘Managing Heat Risk’ states that major development proposals should demonstrate through an Energy Strategy how the proposals will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.

- 6.42 Policy SI5 'Water Infrastructure' indicates that development proposals should achieve mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption).
- 6.43 Policy SI7 'Reducing Waste and Supporting the Circular Economy' ensures that applicants work in collaboration with the Mayor and waste planning authorities to assist with resource conservation, waste reduction, an increase in material re-use and recycling, and reductions in waste going for disposal.
- 6.44 Policy SI13 'Sustainable Drainage' ensures that development proposals aim to achieve greenfield run-off rates and to ensure that surface water run-off is managed as close to its source as possible in line with the drainage hierarchy. The policy supports the use of permeable surfacing and requires that drainage is designed and implemented in ways which promote multiple benefits such as increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity, and recreation.
- 6.45 Policy T2 'Healthy Streets' states that development proposals should deliver patterns of land use that facilitate residents making short, regular trips by walking or cycling. Proposals should be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport, and the dominance of vehicles should be reduced.
- 6.46 Policy T4 'Assessing and Mitigating Transport Impacts' sets out that development plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.
- 6.47 Policy T5 'Cycling' ensures that development proposals help remove barriers to cycling through the provision of appropriate levels of cycle parking which should be fit for purpose, secure, and well-located. Developments should provide cycle parking at least in accordance with the minimum standards within the plan.
- 6.48 Policy T6 'Car Parking' states that car parking should be restricted in line with levels of existing and future public transport and connectivity. Adequate provision should also be made for efficient deliveries and servicing and emergency access.
- 6.49 Policy T6.4 'Hotel and Leisure Uses Parking' requires developments in locations of PTAL 0-3, to be assessed on a case-by-case basis and provision should be consistent with the Healthy Streets Approach, mode share and active travel targets, and the aim to improve public transport reliability and reduce congestion and traffic levels.
- 6.50 Policy T6.5 'Non-residential Disabled Persons Parking' explains that disabled persons parking should be provided, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay.

- 6.51 Policy T7 ‘Deliveries, Servicing, and Construction’ states that development proposals should facilitate safe, clean, and efficient deliveries and servicing. There should be provision of adequate space off-street for this. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance. In addition, during the construction phase of development, inclusive and safe access for people walking and cycling should be prioritised and maintained at all times.

London Plan Supplementary Planning Guidance

- 6.52 Other policy documents that are material to the consideration and determination of this planning application include Supplementary Planning Guidance (SPG), Supplementary Planning Documents (SPD), and London Plan Guidance (LPG) prepared by the Greater London Authority (GLA). These have been taken into consideration throughout the development of the proposal.
- 6.53 A number of supplementary planning documents have been published by the Mayor of London. Whilst initially authored to be supplementary to previous versions of the London Plan, the content and best practice guidance of many of the documents remain relevant. The following London Plan Supplementary Planning Guidance (SPG) documents have been considered as part of the development:
- Accessible London SPG
 - Planning for Equality & Diversity in London SPG
 - Characterisation and Growth Strategy LPG
 - Optimising Site Capacity: A Design-led approach LPG
 - Public London Charter LPG
 - Fire Safety LPG
 - Development Viability LPG
 - Play & Informal Recreation SPG
 - Social Infrastructure SPG
 - Urban Greening Factor LPG
 - Air Quality Positive LPG
 - Air Quality Neutral LPG
 - Be Seen Energy Monitoring LPG
 - Circular Economy Statements LPG

- Energy Planning Guidance
- The Control of Dust and Emissions in Construction SPG
- Whole Life Carbon LPG
- Sustainable Transport, Walking and Cycling

6.54 The LPGs listed above marked with an asterisk have been issued in draft. The LPGs have not yet been formally adopted.

Hillingdon Local Plan

HLP Part 1 – Strategic Policies 2012

Strategic Objectives

- 6.55 Strategic Objective SO1: ‘Conserve and enhance the borough’s heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London’s environmental quality, cultural identity and economy as part of managing London’s ability to accommodate change and regeneration.’
- 6.56 Strategic Objective SO2: Create neighbourhoods that are of a high quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe, functional and accessible and which reinforce the identity and suburban qualities of the borough's streets and public places, introduce public art to celebrate civic pride and serve the long-term needs of all residents.
- 6.57 Strategic Objective SO4: Ensure that development contributes to a reduction in crime and disorder, is resilient to terrorism, and delivers safe and secure buildings, spaces and inclusive communities.
- 6.58 Strategic Objective SO6: Promote social inclusion through equality of opportunity and equality of access to social, educational, health, employment, recreational, green space and cultural facilities for all in the borough, particularly for residents living in areas of identified need.
- 6.59 Strategic Objective SO8: Protect and enhance biodiversity to support the necessary changes to adapt to climate change. Where possible, encourage the development of wildlife corridors.

- 6.60 Strategic Objective SO10: Improve and protect air and water quality, reduce adverse impacts from noise including the safeguarding of quiet areas and reduce the impacts of contaminated land.
- 6.61 Strategic Objective SO11: Address the impacts of climate change, minimise emissions of carbon and local air quality pollutants from new development and transport.
- 6.62 Strategic Objective SO15: 'Protect land for employment uses to meet the needs of different sectors of the economy. Manage the release of surplus employment land for other uses.'
- 6.63 Strategic Objective SO16: 'Manage appropriate growth, viability and regeneration of town and neighbourhood centres.'
- 6.64 Strategic Objective SO17: 'Link deprived areas with employment benefits arising from the development of major sites and existing key locations.'

Policies

- 6.65 Policy E1 'Managing the Supply of Employment Land' states that the Council will accommodate growth by protecting Locally Significant Employment Locations (LSEL) including the designation of 13.63 hectares of new employment land.
- 6.66 Policy E2 'Location of Employment Growth' The Council will accommodate 9,000 new jobs during the plan period. Most of this employment growth will be directed towards suitable sites such as Uxbridge Town Centre with a particular focus around transport nodes.
- 6.67 Policy E4 'Uxbridge' explains that the Council will strengthen the status of Uxbridge Town Centre as a Metropolitan Centre by delivering growth and promoting Uxbridge as a suitable location for retail, offices, hotels, recreation and leisure, entertainment and culture, evening and night-time economy, education, community services, and mixed-use development.
- 6.68 Policy E5 'Town and Local Centres' states that the Council will accommodate additional retail growth in established centres, in accordance with the conclusions of the latest evidence base. Growth for comparison goods will be primarily accommodated in District Centres.
- 6.69 Policy E7 'Raising Skills' explains that the Council will promote Hillingdon as a destination for visitors and tourists and ensure that local residents have access to jobs within related industries.
- 6.70 Policy HE1 'Heritage' states that the Council should actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.
- 6.71 Policy BE1 'Built Environment' details the Council's requirement that all new development to improve and maintain the quality of the built environment in order to create successful and

sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.

- 6.72 Policy EM1 ‘Climate Change Adaptation and Mitigation’ sets out how the Council will ensure that climate change mitigation is addressed at every stage of the development process.
- 6.73 Policy EM6 ‘Flood Risk Management’ explains that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the NPPF. The Council will require all development across the borough to use SuDS unless demonstrated that it is not viable. The Council will encourage SuDS to be linked to water efficiency methods.
- 6.74 Policy EM7 ‘Biodiversity and Geological Conservation’ states that Hillingdon’s biodiversity and geological conservation will be preserved and enhanced, with particular attention given to:
- The provision of biodiversity improvements from all development, where feasible.
 - The provision of green roofs and living walls, which contribute to biodiversity and help tackle climate change.
 - The use of sustainable drainage systems (SuDS) that promote ecological connectivity and natural habitats.
- 6.75 Policy EM8 ‘Land, Water, Air and Noise’ seeks to protect and improve Hillingdon’s environmental quality by addressing key areas: water, air, noise, land contamination, and water resources. It aims to safeguard ground and surface water while ensuring new development does not worsen air quality. The policy also promotes sustainable transport, green infrastructure, and noise reduction. It requires contaminated land to be remediated sustainably and mandates high water efficiency standards.
- 6.76 Policy EM11 ‘Sustainable Waste Management’ sets out the requirements by the Council for all new development to incorporate waste management strategies at every stage of the development’s lifecycle from design and construction through to end use. Developments must ensure waste is handled in accordance with the waste hierarchy, prioritising prevention, reuse, and recycling over disposal.
- 6.77 Policy T1 ‘Accessible Local Destinations’ aims to ensure that new development is directed to the most appropriate and accessible locations in order to minimise pressure on the transport network. It encourages developments that promote sustainable travel, such as walking and cycling, and seeks to maintain good access to local services and amenities for all users.

HLP Part 2 - Development Management Policies 2020

- 6.78 Policy DME 4 ‘Visitor Attractions’ states that the Council will take steps to encourage people to visit heritage and other sites and will support, in principle, proposals that enhance the visitor offer in the Borough.

- 6.79 Policy DME 5 ‘Hotels and Visitor Accommodation’ explains that the Council will support a range of visitor accommodation, conference and related uses in accessible sustainable locations, as defined in the Site Allocations and Designations document.
- 6.80 Policy DME 6 ‘Accessible Hotels and Visitor Accommodation’ requires that all proposals for hotels and visitor accommodation in Hillingdon incorporate inclusive access from the outset. Specifically, developments must comply with the standards set out in the Accessible Hillingdon Supplementary Planning Document (SPD), ensuring that accessibility and inclusivity are embedded into the design and delivery of all such schemes.
- 6.81 Policy DMTC 1 ‘Town Centre Developments’ sets out criteria in which the Council will support ‘main town centre uses’ where the development proposal is consistent with the scale and function of the centre.
- 6.82 Policy DMTC 2 ‘Primary and Secondary Shopping Areas’ states that in primary shopping areas, the Council will support the ground floor use of premises for retail, financial and professional activities and restaurants, cafés, pubs and bars.
- 6.83 Policy DMTC 3 ‘Maintaining the Viability of Local Centres and Local Parades’ explains that the Council will protect and enhance the function of local centres and local shopping parades by retaining uses that support their continued viability and attractiveness to the locality they serve.
- 6.84 Policy DMTC 4 ‘Amenity and Town Centre Uses’ supports proposals for town centre uses such as restaurants, night clubs, or similar uses, provided that they do not result in an over-concentration of similar uses, do not cause unacceptable disturbance to nearby properties from noise, odour, or traffic impacts, and do not harm the character or function of the area in terms of use or visual appearance.
- 6.85 Policy DMHB 1 ‘Heritage Assets’ supports development proposals involving heritage assets where they sustain and enhance the asset’s significance, enable viable long-term use consistent with its conservation, and contribute positively to local character and distinctiveness.
- 6.86 Policy DMHB 2 ‘Listed Buildings’ permits alterations, extensions, or changes of use to listed buildings only where proposals retain the building’s significance and value, and are appropriate in terms of its fabric, historic integrity, spatial quality, and layout. All additions must be sympathetic in scale, proportion, design, materials, and workmanship.
- 6.87 Policy DMHB 4 ‘Conservation Areas’ states that new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area.

- 6.88 Policy DMHB 11 ‘Design of New Development’ explains that all development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design.
- 6.89 Policy DMHB 12 ‘Streets and Public Realm’ requires development to be well integrated and accessible, enhancing the connection with local amenities through clear wayfinding and public realm improvements. Proposals should respect the character of the surrounding townscape, and include purposeful landscaping that supports green infrastructure, enhances visual quality, and facilitates movement.
- 6.90 Policy DMHB 13 ‘Shopfronts’ seeks to ensure that new or altered shopfronts respect the design, proportions, materials, and detailing of the host building and surrounding streetscape. The Council will also resist the removal of shopfronts of architectural or historic interest, particularly those on the Local List.
- 6.91 Policy DMHB 14 ‘Trees and Landscaping’ requires all developments to retain or enhance existing trees, landscaping, and natural features of merit. Proposals must include a landscape scheme appropriate to the character of the area, which supports biodiversity and amenity, especially in areas lacking green infrastructure. Where ground-level planting is limited, living roofs and walls should be incorporated where feasible.
- 6.92 Policy DMHB 15 ‘Planning for Safer Places’ states the requirement of the Council for all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.
- 6.93 Policy DMEI 1 ‘Living Walls and Roofs and on-site Vegetation’ explains that all development proposals are required to comply with incorporating living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided.
- 6.94 Policy DMEI 2 ‘Reducing Carbon Emissions’ sets out that all developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- 6.95 Policy DMEI 7 ‘Biodiversity Protection and Enhancement’ ensures the design and layout of new developments retains and enhances any existing features of biodiversity or geological value within the site.
- 6.96 Policy DMEI 10 ‘Water Management, Efficiency, and Quality’ states that applications for all new build developments (not conversions, change of use, or refurbishment) are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy (Policy 5.13: Sustainable Drainage).

- 6.97 Policy DMEI 12 ‘Development of Land Affected by Contamination’ states that all proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants.
- 6.98 Policy DMEI 14 ‘Air Quality’ explains that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.
- 6.99 Policy DMT 1 ‘Managing Transport Impacts’ sets out the requirements for development proposals in order to meet the transport needs of the development and address its transport impacts in a sustainable manner.
- 6.100 Policy DMT 2 ‘Highways Impacts’ requires development proposals to provide safe and efficient vehicular access meeting Council standards, avoid worsening air quality, noise, or local amenity, and ensure safe, secure, and convenient access for pedestrians and cyclists.
- 6.101 Policy DMT 5 ‘Pedestrians and Cyclists’ states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.
- 6.102 Policy DMT 6 ‘Vehicle Parking’ explains that development proposals must comply with the parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity.

HLP Part 2 – Site Allocations and Designations 2020

- 6.103 Policy SEA 2 ‘Hotel and Office Growth Locations’ identifies Uxbridge Town Centre as a designated area for both hotel and office growth, promoting it as a key location for commercial development. In line with the Council’s evidence base, the policy seeks to support and protect a network of such growth locations across the borough to encourage sustainable economic development and job creation.

Hillingdon Supplementary Planning Documents (SPDs)

- 6.104 Hillingdon have also adopted a series of Supplementary Planning Documents (SPDs) which support the Local Plan and provide further guidance on key areas of consideration. These are listed below:
- Planning Obligations SPD (July 2014)
 - Accessible Hillingdon SPD (September 2017)

7. Planning Assessment

Introduction

- 7.1 This section considers the key matters relating to the proposals in the context of relevant planning policy, as well as material considerations. It is important to emphasise that Section 38(6) of the Planning & Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant Development Plan, unless material considerations indicate otherwise.
- 7.2 In this case, the planning application must be assessed against national, regional (London), and local (Hillingdon) planning policy and guidance as set out in the previous section. This section details how the proposals accord with the relevant planning policies, as set out under the following sub-headings:
- Principle of Development
 - Site Layout and Design
 - Heritage
 - Transport and Parking
 - Landscaping, Ecology, and Biodiversity
 - Daylight and Sunlight
 - Energy and Sustainability
 - Air Quality
 - Odor
 - Noise
 - Flood Risk and Drainage
 -
 - Fire
 - Structural
 - Contamination

Principle of Development

Change of use from Nightclub to Banqueting Suite

- 7.3 This application seeks planning permission for the change of use of the existing nightclub (Sui Generis) to a banqueting suite (Sui Generis).
- 7.4 While Policy E4 of Hillingdon Local Plan: Part 1 (2012) and London Plan Policy HC6 aims to protect night-time economy uses, the proposed banqueting suite would maintain and extend this role. Based on publicly available information online¹, the former nightclub operated between approximately 9:30pm and 3:00am and the operational hours were not conditioned for any previous planning application for the site on the Hillingdon planning portal.
- 7.5 The banqueting suite, by contrast, is proposed to operate between 10:00am and 01:00am, thereby offering daytime activities for company events (team-building, away-days, etc) and late-night events. The reduced hours will alleviate the concerns related to traffic congestion and ensure that individuals attending are still able to access public transport at the end of the event. This will significantly improve the nightlife without reducing the amenity of nearby neighbours, thus ensuring compliance with London Plan Policy D14. Further, the reduced hours will also alleviate noise concerns late into the night, thus protecting the amenity of neighbours and ensuring compliance with Hillingdon Local Plan: Part 1 (2012) and Part 2 (2020) Policies EM8 and DM1C4.
- 7.6 The banqueting suite will serve a wide range of functions, including weddings, receptions, corporate events, and cultural celebrations, and will cater to a far larger demographic than the former nightclub. The banqueting suite sits comfortably within the range of uses actively supported in town centres and aligns with the policy objectives of encouraging economic growth, tourism, and flexible community uses. The change of use is therefore consistent with both the strategic direction of the London Plan and local policies promoting town centre vitality and diversification, especially the aforementioned Policies E4 'Uxbridge' and HC6 'Supporting the Night-time Economy'.
- 7.7 The proposal also forms part of a wider scheme that facilitates the heritage-led restoration of a significant listed building, ensuring its continued public use and long-term sustainability. The incorporation of the historic music rooms, conservation of the organ, and restoration of key architectural elements will enable a wider audience to experience the building's cultural significance in a meaningful and active way, on a regular, easily accessible basis, to a much greater extent than at the nightclub.

Loss of Class E Use (Former Gym) and Hotel Development

- 7.8 The proposal also involves the change of use of a former gym, previously operating under Use Class E, which has been vacant for approximately eight years. Located behind a secondary

¹ [LIQUID & ENVY - Updated July 2025 - 233 High Street, Uxbridge, London - Clubs - Yelp](#)

shopping frontage and opposite a primary shopping area, the gym once formed part of the town centre's commercial offering. However, prior to its closure, it operated at a limited scale, employing only one staff member and offering minimal contribution to the public realm or broader economic activity.

- 7.9 Policy E4 of the Hillingdon Local Plan: Part 2 (2012) promotes Uxbridge as a location for a diverse range of town centre uses, including hotels, recreation, and leisure. While the plan encourages the protection of active Class E uses to maintain vibrancy, in this case, the gym's prolonged vacancy and limited employment role highlight that it no longer contributes meaningfully to town centre vitality. Policy DMTC 3 further supports this view, seeking to maintain the viability and attractiveness of local centres by encouraging uses that support their ongoing function. The proposed change of use to a hotel would more effectively serve this goal by revitalising a long-vacant unit and enhancing activity in the area.
- 7.10 The proposed hotel use represents a more intensive and sustainable re-use of this space, directly supporting the wider regeneration and reuse of the listed building. The hotel will provide 31 guest rooms and generate approximately 10 full-time equivalent new jobs across a range of roles, marking a clear net gain in employment. It will also support increased footfall and town centre activity throughout the day and evening, particularly in connection with the proposed banqueting suite.
- 7.11 Hotel accommodation in this location is explicitly supported by Policy SEA2 of the Hillingdon Local Plan: Part 2 (2020): Site Allocations and Designations, which identifies Uxbridge Town Centre as a designated area for hotel and office growth. This aligns with the Council's wider strategy to support a network of commercial growth areas across the borough, contributing to sustainable economic development and job creation. The proposed hotel development will enhance the town centre's visitor economy, support surrounding businesses, and promote overnight stays linked to cultural, heritage, and event-based tourism such as weddings and conferences.
- 7.12 Furthermore, Policy DMTC 4 supports the introduction of town centre uses such as restaurants, nightclubs, or similar facilities, provided they do not cause unacceptable impacts in terms of noise, traffic, or disturbance, and do not harm the character or function of the area. The proposed banqueting suite, located within an enclosed building with managed operations, is designed to avoid such impacts and complement the mixed-use character of the town centre.
- 7.13 In summary, the proposed change of use of the nightclub to a banqueting suite and the former gym to a hotel both comply with the aims of local and regional policy. The scheme introduces high-value, compatible uses that support town centre regeneration, contribute positively to employment, and ensure the sustainable future of a heritage asset. The principle of development for the change of use is therefore considered acceptable.

Site Layout and Design

Scale, Massing, and Site Layout

- 7.14 The scheme adopts a heritage-led design approach, with proposals rooted in a thorough historical and architectural understanding of the building. Restoration of key heritage features, including the original entrance foyer, plasterwork, music rooms, and entrance canopy, is central to the proposal. The use of traditional materials and techniques in these elements ensures the building's special interest is retained and celebrated. Internal spaces such as the disused gym and music rooms will be repurposed to serve hotel functions in a way that respects the historic fabric, whilst back-of-house operations are sensitively integrated into the rear of the site with minimal physical interventions.
- 7.15 The new extension is proposed to the west of the existing cinema and has been carefully designed to respect the scale, massing, and materiality of the host building. The extension is intentionally set back from the street and positioned lower than the existing cinema building to minimise visual competition and preserve key sightlines to the listed structure. While it sits against the north-western site boundary, the design acknowledges its proximity to adjacent heritage buildings and incorporates articulation in the building form to soften its relationship with neighbouring structures. This provides a transitional massing that steps down from the cinema towards the smaller-scale surroundings.
- 7.16 Site layout improvements include the creation of a landscaped buffer along the western boundary. This addresses earlier concerns about the proximity of the extension to the adjacent footpath and neighbouring buildings, offering a softened and safer edge condition. The resulting green strip provides visual relief, mitigates any potential daylight/sunlight impacts, and enhances the pedestrian experience along the footpath, contributing to the wider public realm. Although the site layout produces a narrow transitional space at the edge, this is designed as an intentional landscaping feature rather than residual land, in keeping with urban repair principles.
- 7.17 The architectural language of the extension draws directly from the historic cinema while asserting a contemporary identity. The material palette includes stone, terrazzo, white render, and metal-framed glazing, ensuring compatibility with the existing fabric. The glazed link between old and new serves as a respectful visual and physical transition, protecting the integrity of the historic brickwork while clearly distinguishing the extension as a new intervention.
- 7.18 A rigorous analysis of the building's decorative and stylistic features has informed the detailed design. Elements such as diagonal window framing, scalloped plaster detailing, and hexagonal motifs are reinterpreted in the new build, reinforcing the narrative connection between the original cinema and its contemporary addition. While direct imitation is avoided,

subtle references to Egyptian Revival architecture, reminiscent of the cinema's stylistic origins, have been explored to create coherence. Inspiration has been taken from comparable examples such as Hend House, the Carreras factory, and Darb Al Labbana (Cairo), with decorative screens and structured rhythms influencing window composition and screen treatment.

- 7.19 The layout has been carefully designed to accommodate guests both internally within the foyer areas and externally within the forecourt fronting the High Street, ensuring that adequate waiting space is available in the development.
- 7.20 Overall, the design enhances the setting of the listed building, strengthens the townscape presence of the site, and contributes positively to Uxbridge Town Centre. The design reflects the aspirations of local policy, including Hillingdon Local Plan: Part 1 (2012) and Part 2 (2020) policies on heritage, design, and town centre development, and is considered a high-quality and contextually responsive scheme.

Heritage

- 7.21 The Heritage Statement, prepared by HEA, provides a comprehensive assessment of the architectural and historic significance of the former Regal Cinema building. The report identifies the building's core heritage values as being rooted in its 1930s Art Deco design by renowned cinema architect E. Norman Bailey, notably featuring largely intact decorative plasterwork and the original Compton organ.
- 7.22 The assessment concludes that the proposed refurbishment and extension scheme has been carefully designed to preserve and enhance these significant elements. The scheme will retain the building's distinctive architectural character and historic fabric while enabling greater public appreciation of its heritage through adaptive reuse and improved accessibility. This approach reflects the intent of Policy DMHB 1, which supports development that sustains and enhances the significance of heritage assets, enables viable long-term use, and contributes positively to local character.
- 7.23 The proposals also comply with Policy DMHB 2, which permits alterations or changes of use to listed buildings only where such interventions preserve the building's significance and are appropriate in terms of scale, proportion, materials, and design. The scheme responds sensitively to the building's historic integrity, spatial quality, and layout, ensuring any additions are sympathetic to its original character.
- 7.24 The existing Grade II* building is on the Historic England Heritage at Risk Register noting that the condition is 'Very Bad'; the vulnerability is 'High'; and the trend is 'Declining'². The proposals support the objectives of Policy HE1, which encourages the regeneration of heritage assets, particularly those that are vacant or at risk. By bringing the listed building

² [Discotheque Royle, High Street - Hillingdon | Historic England](#)

back into active use, the development delivers long-term sustainability and heritage-led regeneration in this part of the town centre.

- 7.25 The Heritage Statement confirms that the scheme preserves and enhances the character and appearance of the Uxbridge Conservation Area, ensuring the development integrates seamlessly within its historic setting. This is consistent with London Plan Policy HC1, which requires proposals affecting heritage assets and their settings to conserve their significance and respond sympathetically to their surroundings. Furthermore, the Heritage Statement concludes that the proposed works to the significance of the listed building will be neutral-beneficial.
- 7.26 In summary, the proposed scheme provides a sensitive and well-considered response to the site's heritage context, aligning with both local and strategic policy objectives. It secures the future of a significant listed building through a viable, high-quality development that enhances public engagement with the borough's built heritage.

Transport and Parking

- 7.27 A Transport Statement has been prepared by RKS Associates in support of the proposed development. The assessment confirms that the site benefits from a high level of accessibility, with a PTAL rating of 6a, thereby supporting the use of sustainable travel modes, including public transport, walking, and cycling. This level of accessibility ensures the development is well-aligned with both local and strategic transport planning objectives.
- 7.28 In line with Hillingdon Local Plan: Part 2 (2020) Policy DMT 1 'Managing Transport Impacts', Policy DMT 2 'Highways Impacts', Policy DMTC 4 'Amenity and Town Centre Uses', and London Plan Policy T4 'Assessing and Mitigating Transport Impacts', the proposals have been assessed to ensure they meet the transport needs of the development while minimising impact on the surrounding highway network. A review of local highway accident data indicates no specific accident patterns across the highway network in the vicinity of the site. Based on the review of PIC data in the report, there are no existing highway safety issues in the vicinity of the site which would be exacerbated by the proposed development. A trip generation assessment included in the report also stated that the hotel and banqueting suites could generate up to 32 two-way vehicle trips, highlighting that the trips are likely to occur during off-peak hours due to the nature of the development, thus having a negligible impact upon the local highway network. It is therefore concluded that the residual cumulative impacts are considered acceptable in terms of the policy highlighted above.
- 7.29 It is noted that the Highway Officer comments highlighted that a higher number of vehicle trips could be anticipated; however, an analysis of the Premier Banqueting Suite in Harrow noted that the vast majority of guests arriving at the venue used sustainable methods of transport, to reach the destination. Private vehicle use accounted for just under one-third of transportation to and from the site. It is acknowledged that the Premier Banqueting Suite

does not share identical characteristics with the proposed development; however, it offers a useful benchmark for the purposes of the report in regard to parking provision.

- 7.30 In compliance with Policy DMT 6 'Vehicle Parking' and London Plan Policies T2 'Healthy Streets', and T6 'Car Parking', the development has obtained permission through a legal agreement to utilise the nearby Chimes car park primarily for visitors to the banqueting suite, ensuring that the development does not lead to deleterious impact on street parking provision, congestion, or local amenity. This agreement will be renewed on an annual basis and is sought to be secured within the Section 106 to ensure that no events take place without this in situ. The car park has a total of 1,550 spaces across 6 levels, with levels 2 – 6 closed between 1 am and 6 am, and level 1 remaining open 24 hours. It is therefore considered that the amount of parking available is suitable, accounting for the site's high public transport accessibility. The use of the car park also ensures that the streets avoid car dominance, and assists the proposal in meeting the ten healthy street indicators as set out in Policy T2.
- 7.31 Two blue badge parking spaces are provided to the front of the hotel and banqueting suite. Both spaces would accommodate the installation of electric vehicle charging points.
- 7.32 Vehicle tracking confirms that vehicles will be able to access the site from High Street and manoeuvre within the site and exit in a forward gear, satisfying the Council's standards for access and circulation.
- 7.33 To promote active travel and meet the requirements of Policy DMT 5 'Pedestrians and Cyclists', the proposals also provides 10 secure cycle parking spaces. These will be available for both short-stay visitors and longer-stay users, including staff, encouraging more sustainable, inclusive, and healthy travel behaviours.
- 7.34 In line with London Plan Policy T7 'Deliveries, Servicing and Construction', servicing and deliveries will be undertaken via the existing service road located to the rear of Nos. 224-233 High Street. Vehicle swept path drawings included in the submitted Transport Statement demonstrate that servicing and refuse collection vehicles can safely and successfully manoeuvre behind the development to complete their tasks as is the current set up. Furthermore, servicing and refuse collection will be managed through a Service Management Plan, setting out appropriate controls and scheduling to ensure all operations are carried out in a regulated manner, minimising disruption, and maintaining safe operations of the nearby highway network.
- 7.35 Overall, the Transport Statement and access strategy for the development have been carefully designed to respond to the issues raised during pre-application as well as the refusal on the previous planning application. The report concludes that the development would be able to ensure safe, inclusive access for all users. The proposals are fully compliant with the objectives of the Hillingdon Local Plan: Part 1 (2012) and Part 2 (2020) and the London Plan in respect of transport, highways, and parking provision.

Landscaping, Ecology, and Biodiversity

- 7.36 A Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment have been undertaken by Gradwell Group, to support the proposed development.
- 7.37 The Preliminary Ecological Appraisal was carried out in July 2025 and included a desk-based study and an extended Phase 1 habitat survey in accordance with the relevant CIEEM and UK Habitat Classification methodologies. The survey area covers approximately 0.32 hectares, primarily comprising sealed surfaces, buildings, and scattered urban trees. The surrounding area is largely urban in character, with limited ecological connectivity and few green corridors or habitats in the immediate vicinity, aside from a grassed area with mature trees located adjacent to the site's southern boundary.
- 7.38 Although the site's ecological value is limited due to its urban context, habitats present have the potential to support certain protected or notable species. As such, appropriate mitigation measures have been identified to ensure the protection of wildlife during construction. These include species protection measures, timing constraints for works, and the safeguarding of retained trees. Post-development, biodiversity enhancements are also proposed to provide longer-term ecological benefits in line with national and local policy.
- 7.39 In addition, a Biodiversity Net Gain Assessment has been completed using the Statutory Biodiversity Metric (Natural England, 2024). The baseline biodiversity value of the site has been calculated at 0.34 habitat units and 0.00 hedgerow units. Post-development, the site is expected to maintain 0.34 habitat units and 0.00 hedgerow units, resulting in a net gain of 0.00% for habitat units. This outcome reflects the fact that all existing on-site habitats, particularly trees, will be protected and retained.
- 7.40 As the proposals do not result in the loss of more than 25 sqm of habitat, the development qualifies for the de minimis exemption under current BNG regulations, subject to submission of a suitable tree protection plan of which could be conditioned as part of any determination.
- 7.41 The proposals are therefore in accordance with Policy EM7 'Biodiversity and Geological Conservation', which seeks the provision of biodiversity improvements from development and encourages sustainable drainage and green infrastructure where feasible. The development also complies with Policy DMEI 7 'Biodiversity Protection and Enhancement', as the layout has been designed to retain existing natural features and avoid ecological harm. Additionally, the retention of existing trees supports Policy DMHB 14 'Trees and Landscaping', which requires developments to protect or enhance landscaping and biodiversity, including through tree retention and appropriate landscape schemes.

Daylight and Sunlight

- 7.42 A Daylight and Sunlight Assessment has been undertaken by The Chancery Group in accordance with the BRE 209 guidelines (2022). The assessment concluded that the proposed

built development would result in negligible to minor effects on surrounding residential properties. No relevant amenity areas were identified for assessment.

- 7.43 Overall, the impact was considered acceptable, with the development meeting local, regional, and national planning policy requirements relating to daylight and sunlight.

7.44 **Energy and Sustainability**

- 7.45 An Energy and Sustainability Statement has been prepared by PES in support of the proposed development. The assessment follows the London Plan's energy hierarchy and uses the latest GLA guidance, including SAP 10.2 emissions data, to evaluate the building's performance and its contribution to reducing greenhouse gas emissions.
- 7.46 In line with Policy DMEI 2 'Reducing Carbon Emissions' and London Plan Policy SI2 'Minimising Greenhouse Gas Emissions', the assessment confirms that the development delivers a significant improvement in energy performance over current Building Regulations. Without intervention, the scheme would produce 37,311 kg of CO₂ emissions annually. Through the integration of passive design strategies, this figure is reduced to 29,398 kg/year.
- 7.47 The Energy Strategy has also been developed in accordance with Policy SI4 'Managing Heat Risk', ensuring that internal overheating is minimised and reliance on air conditioning is reduced. The design incorporates efficient ventilation, solar control measures, and appropriate glazing, supporting the cooling hierarchy and reducing operational energy demand.
- 7.48 To meet Policy SI3 'Energy Infrastructure', the feasibility of connecting to a district heating network and implementing various low-carbon technologies was explored. The site is not located within a Heat Network Priority Area; however, the proposed solution includes a high-efficiency VRF heat pump system to serve the building's heating, cooling, and domestic hot water demands. This is complemented by the installation of a 14.52kWp photovoltaic array at roof level on the new hotel building, contributing renewable energy generation to the scheme.
- 7.49 The Energy Strategy results in a 37.3% overall reduction in CO₂ emissions across the site compared to the baseline, and a 47.8% improvement in regulated emissions beyond Part L Building Regulations. This exceeds the minimum 35% reduction target required for major developments, demonstrating clear alignment with local and London Plan policy objectives on sustainability and carbon performance. To achieve net-zero, a carbon offset contribution of £43,242 can be secured within the Section 106.
- 7.50 The scheme represents a strong commitment to delivering a low-carbon, energy-efficient development and reflects best practice in environmental design for town centre regeneration.

Air Quality

- 7.51 Create Consulting Engineers Ltd were appointed to undertake an Air Quality Assessment (AQA) in support of the proposed redevelopment.
- 7.52 During the construction phase, potential air quality impacts from dust emissions associated with demolition, earthworks, construction, and track out activities were assessed using IAQM and Mayor of London SPG methodologies. Provided that good practice dust control measures are implemented, the residual significance of these impacts is predicted to be negligible.
- 7.53 For the operational phase, the assessment confirms that predicted annual mean NO₂ and PM₁₀ concentrations will fall below the relevant Air Quality Objectives (AQOs) by the proposed year of operation (2028), and the development is anticipated to have a negligible impact on local air quality in accordance with EPUK-IAQM guidance.
- 7.54 An Air Quality Neutral Assessment concluded that, due to the use of air source heat pumps (ASHP) and low trip generation, both building and transport-related emissions fall below the relevant benchmarks.
- 7.55 Further mitigation measures are proposed to reduce operational impacts. With these measures in place, air quality should not pose a constraint to granting planning permission.

Odour

- 7.56 To address concerns brought forward from the previously refused application related to odour, details of kitchen requirements and a flue has been proposed from the kitchen to a central flue within the new storage and laundry spaces of the hotel within the old gym structure. This will emerge at the roof level, terminating in a metal structure similar to already existing venting and heating systems. It will not be visible from the ground floor, and would therefore have no impact on the listed building. This is assessed in the Heritage Statement which concludes that there would be no impact on the significance of the heritage asset. The assessments detailed above and the addition of the flue ensure compliance with Hillingdon Local Plan: Part 2 (2020) Policies EM8 'Land, Water, Air and Noise' and BE1 'Built Environment', as well as London Plan Policy SI 1 'Improving Air Quality'.

Noise

- 7.57 Create Consulting Engineers undertook a baseline acoustic survey at the site of the proposed hotel and banqueting hall. The data collected has informed a detailed assessment, including recommendations for appropriate building envelope constructions and plant noise limits to ensure acceptable noise levels are maintained both within and around the development.
- 7.58 All recommendations set out in the submitted report should be reviewed and agreed upon with the local authority prior to the commencement of development of which can be secured by planning condition. The submission also incorporates a Noise Management Plan to ensure

that surrounding residential amenity is efficiently protected and managed in regard to noise matters or concerns.

- 7.59 At this stage, however, it is considered that there are no significant noise-related constraints which would prevent planning permission from being granted. The proposed development is expected to represent a positive acoustic addition to the area, with no unacceptable impacts identified. Additionally, the reduction in hours and lack of planning control over the permitted nightclub use previously stated will reduce the level of noise at night to a more acceptable time frame, ensuring that amenity is impacted.

Flood Risk and Drainage

- 7.60 An updated Flood Risk Assessment and Drainage Strategy Report has been prepared by Nimbus Engineering in May 2026 in support of the proposed development, with amendments to accommodate the changes made to the proposal.
- 7.61 The report concludes that the site is located in an area with very low risk of flooding from tidal, fluvial, sewer, and reservoir sources. While there is a low risk of surface water flooding during a 1 in 1000-year storm event, and some potential for groundwater flooding below ground level, these risks have been addressed through appropriate mitigation measures. The development will not affect any known flood flow routes or existing flood storage areas.
- 7.62 A SuDS strategy has been developed in accordance with the SuDS hierarchy. This strategy significantly reduces the peak surface water runoff rate from the site to 1.7 litres per second, representing a 97.75% reduction in runoff during the 1 in 100-year storm event. As such, the proposed SuDS solution fully aligns with all relevant national, regional, and local planning policies relating to flood risk and drainage.
- 7.63 The previously refused planning application noted that the inclusion of the basement posed too much risk to the heritage of the building and its structural integrity. Subsequently, the basement has been removed to ensure compliance with London Plan (2021) Policies SII2, SII3, and HC1. Additionally, the removal of the basement reduces the risk of flooding and structural damage, such that the proposal is now fully compliant with the policies of the Hillingdon Local Plan: Part 2 (2020), DMEI9, DMEI10, DMHB1, DMHB2, and DMHD3.
- 7.64 A proposed 222² of sedum/green roofing has been proposed for the flat roof areas of the proposed hotel. This proposal is further detailed in the revised FRA&SuDS report, as well as outlined in document C3783-03 within Appendix A of the report. The addition of the green sedum ensures that green infrastructure is incorporated as a key feature of the drainage strategy, in line with the requirements of the London Plan drainage hierarchy.
- 7.65 The altered site area has been increased to 1006m² due to repaving of the existing access roads and pavings.

- 7.66 Rainwater harvesting pipes are proposed to be internal, and a large attenuation tank has been proposed towards the front of the site, reducing risk of flooding harming the development. This would be situated 18 metres from the nearest corner of the Grade II* Listed Building to ensure there would be no impact on its structural integrity.
- 7.67 The report also confirms that the revised surface water drainage strategy has been completed in accordance with the London Plan drainage hierarchy, ensuring that there is no unacceptable flood risk or downstream drainage impacts. The design is suitable according to policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policies SI 12 and SI 13 of the London Plan (2021), and paragraphs 181 and 182 of the National Planning Policy Framework (2024).

Fire

- 7.68 A Fire Statement has been prepared by Fire Safety Services in accordance with the requirements of London Plan Policy D12A, which seeks to ensure the highest standards of fire safety are embedded from the earliest stages of design. The statement demonstrates that appropriate measures have been incorporated into the proposals to safeguard future occupants and to provide suitable access and facilities for firefighting.
- 7.69 The Fire Statement confirms that the development meets the requirements of Policy D12A. A more detailed Fire Strategy will be developed at RIBA Stage 3, addressing each part of the policy in relation to Part B Functional Requirements. This strategy will continue to evolve during the detailed design stage and will be agreed with the relevant approving authorities ahead of submission to the fire service.

Structural

- 7.70 Several modifications have been made to the proposal in light of the previous refused planning application to ensure that the development is responsive to the concerns raised.
- 7.71 the previously proposed basement has been removed from the development entirely, with parking now assigned to the nearby Chimes shopping centre upheld through legal agreement.
- 7.72 An updated structural assessment undertaken by Martin Structural Engineers Limited in June 2026 confirms that the new hotel building can be designed and constructed in such a way as to have no adverse impact on the Grade II* listed building. It will be entirely self-supporting and structurally independent of it. Additionally, the use of non-intrusive foundation systems and carefully managed construction techniques, as well as a commitment to future regulatory compliance, will ensure no adverse impact on the listed structure throughout the construction and its operational life.
- 7.73 It is also noted that the previous application received no objections from the local authority Heritage Officer or Historic England regarding structural integrity. The consultees confirmed

that details of structural matters could be secured by planning condition. The removal of the basement and subsequent structural assessment verifies that the proposal is now in full compliance with policies DMEI 9, DMEI 10, DMHB 1, DMHB 2 and DMHD 3 of the Hillingdon Local Plan: Part 2 (2020), and Policies HC1, SI 12 and SI 13 of the London Plan (2021).

Contamination

- 7.74 A desk-based contamination assessment carried out by Landmark Information concluded that no significant contaminant linkages have been identified on the site. As such, the risk of environmental or health-related liabilities associated with contaminated land is considered to be low. The report confirms that no further investigative or remedial action is required, supporting the site's suitability for the proposed development.

8. Planning Benefits

- 8.1 This planning application accords with adopted planning policies at a national, regional, and local level. Beyond the technical compliance, this chapter summarises the key benefits that would result from the approval of this application.

Refurbishment and re-use of a vacant at-risk listed building

- 8.2 The proposal delivers a significant public benefit through the sensitive refurbishment and extension of a vacant at-risk Grade II* listed building, securing its long-term future through adaptive reuse. By introducing a 31-room hotel with integrated banqueting and hospitality facilities, the scheme revitalises underused internal spaces and reactivates a prominent heritage asset at the heart of Uxbridge Town Centre.
- 8.3 The works will preserve and enhance the building's architectural and historic significance, including key features such as the entrance canopy, decorative plasterwork, and the original Compton organ. The new hotel building has been carefully designed to respect the listed structure and surrounding conservation area.

Introduction of high-quality architectural design

- 8.4 The scheme introduces a high-quality new hotel building that is architecturally distinctive yet sensitively designed to sit comfortably alongside the historic cinema building. The contemporary addition incorporates thoughtful massing, refined detailing, and a palette of materials that complement the surrounding context, reinforcing the site's visual identity and contributing positively to the character and appearance of Uxbridge High Street and the wider conservation area.

Increased landscaping and public realm enhancements

- 8.5 The proposal delivers clear public benefits through high-quality landscaping and public realm improvements. A green buffer along the western boundary will soften the building edge, improve safety, and enhance the pedestrian experience. To the south, upgraded paving, tree planting, and terrazzo steps will create a more welcoming and attractive civic frontage. Sedum green roofs will support biodiversity and sustainable drainage, contributing to the site's overall environmental value and visual amenity.

Sustainable and energy-efficient development

- 8.6 The proposal incorporates sustainability at its core through energy-efficient design and construction. The use of sedum green roofs supports biodiversity and reduces surface water runoff, while the building materials have been selected for durability and low environmental impact. Internal upgrades will improve thermal performance, and the overall scheme

promotes adaptive reuse of a historic structure, minimising waste and embodied carbon by retaining and enhancing the existing building form.

Contributing to Local Economic Growth

- 8.7 The proposed development supports Hillingdon's strategic objective to enhance its tourism offer, which is a key contributor to the local economy. As identified in the Hillingdon Local Plan: Part 1 (2012), tourism generates significant economic value (estimated at £697 million in 2007) and accounts for over 8% of borough-wide employment, exceeding the London average.
- 8.8 The delivery of a high-quality hotel and banqueting suite will directly respond to this identified need by improving visitor accommodation and event facilities within the borough. This, in turn, will contribute to the ongoing growth of Hillingdon's tourism sector and the wider local economy, reinforcing the borough's position as one of London's most important destinations for visitor infrastructure.

Accessibility and Inclusion

- 8.9 The scheme significantly improves accessibility across the site, introducing step-free access to all public and guest areas, including historically inaccessible portions of the building. Inclusive design principles have been embedded throughout, complying with London Plan Policy D5.

Immediately Deliverable Development

- 8.10 The proposal represents an immediately deliverable scheme, with no legal, ownership, or infrastructure constraints preventing prompt implementation. The site is under single ownership, all necessary surveys and assessments have been completed. This ensures that the other public benefits mentioned can be experienced without delay, in line with national and local policy objectives to prioritise deliverable, sustainable development.

9. Previous Planning Application

- 9.1 The refusal of the full planning application (ref. 3638/APP/2025/2108) issued on 15 April 2026 cited policies from the Hillingdon Local Plan: Part 1 (2012) and Part 2 (2020), London Plan (2021), National Planning Policy Framework (2024), and adopted Planning Obligations Supplementary Planning Document (2014). Each reason for refusal set out in the previous decision notice has been addressed in this section indicating that the revised proposals now seeks to address the concerns raised and should be approved.

Reason for Refusal 1

- 9.2 *‘The application submission fails to satisfactorily demonstrate that the proposal would not give rise to unacceptable adverse impacts upon the highway network, as a result of traffic congestion, parking stress and harm to highways safety. As such, the development is contrary to Policies DM1, DM2 and DM1C4 of the Hillingdon Local Plan: Part 2 (2020), Policies T2, T4 and T7 of the London Plan (2021) and paragraph 116 of the National Planning Policy Framework (2024).’*
- 9.3 In response to the policies cited above, we wish to emphasise the points set out in the Transport and Parking section of this planning statement alongside the submitted Transport Statement, Travel Plan, and Vehicle Tracking Drawings. These cover a thorough review of the local highway accident data, trip generation data, and a confirmation that the proposal would pose no greater accident risk, nor an excessive increase in trips. Though basement parking has been removed, accessible parking is still available on site, and a legal agreement with the nearby Chimes shopping centre will grant guests 24-hour access to parking for private vehicle use. To alleviate any concerns, this agreement can be secured within the Section 106 to ensure that no events can take place without an agreement for parking being in place.
- 9.4 Further, the area benefits from highly sustainable public transport connections, having a 6a rating on the PTAL scale, as well as close access to Uxbridge Train Station and 24-hour buses. It is therefore considered that the proposal is now in alignment with policies DM1, DM2, and DM1C4 of the Hillingdon Local Plan: Part 2 (2020).
- 9.5 The legal agreement with the Chimes to provide 24-hour parking also ensures that the nearby highway network and streets remain unaffected throughout the operations of the banqueting suite and hotel, ensuring full accordance with Policies T2, T4, and T7 of the London Plan (2021) and Paragraph 116 of the NPPF.
- 9.6 The Transport Statement submitted with the application includes a section demonstrating how each of the previous Highways Objections have been addressed as part of this revised application.

Reason for Refusal 2

- 9.7 *‘The application submission fails to demonstrate that satisfactory provision has been made for the management of surface water drainage on the site, which both accords with the London Plan drainage hierarchy and would ensure no unacceptable flood risk/drainage impacts. As such, the development is contrary to Policies DMEI 9 and DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policies SI 12 and SI 13 of the London Plan (2021) and paragraphs 181 and 182 of the National Planning Policy Framework (2024).’*
- 9.8 In response, the drainage has been reviewed again, with a Flood Risk and Drainage Strategy Report from Nimbus Engineering concluding very low flood risk, and stating that the risk has been addressed through appropriate mitigation measures. The SuDS strategy has been developed in accordance with the SuDS hierarchy, as well as London Plan Policies SI 12 and SI 13. Similarly, the proposal is in full accordance with the Hillingdon Local Plan: (Part 2) Policies DMEI 9 and DMEI 10, as set out in sections 7.61 and 7.65 of the Flood Risk and Drainage section.
- 9.9 Confirmation of compliance with the previous objections raised by the LLFA have been included in the submitted Flood Risk Assessment and SuDS Report.

Reason for Refusal 3

- 9.10 *‘The application submission fails to satisfactorily demonstrate that the basement proposal would maintain the structural stability of the Grade II* listed building and neighbouring properties (including locally listed building); avoid adversely affecting drainage, groundwater flood risk and surface water runoff or cause other unacceptable damage to the water environment in the local area. As such, the development is contrary to Policies DMEI 9, DMEI 10, DMHB 1, DMHB 2 and DMHD 3 of the Hillingdon Local Plan: Part 2 (2020), Policies HC1, SI 12 and SI 13 of the London Plan (2021) and Chapters 14 and 16 of the National Planning Policy Framework (2024).’*
- 9.11 After careful review and assessment, the applicant has decided to remove the basement aspect of the proposal. The structural assessment conducted by Martin Structural Engineers has since found that the proposal is sound in terms of its design and construction capabilities with consideration to foundations required for the proposed hotel, again, having no adverse impact upon the Grade II* listed building.
- 9.12 Furthermore, the removal of the basement eliminates concerns related to flooding that were considered could harm the local area. It is considered that the proposal is now in full alignment with policies DMEI 9, DMEI 10, DMHB 1, DMHB 2, and DMHD 3 of the Hillingdon Local Plan: Part 2 (2020), as well as policies HC1, SI 12 and SI 13 of the London Plan (2021).
- 9.13 It is also noted that the Hillingdon Heritage Officer and Historic England raised no objections to the previous application (including the basement) regarding structural integrity; instead

recommending that conditions could be secured to provide this information prior to commencement.

Reason for Refusal 4

- 9.14 *‘The applicant has failed to secure Section 106 planning obligations required to mitigate the harm and demands created by the proposed development (in respect of carbon offset, air quality, and project management and monitoring). As such, the development is contrary to Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020), the adopted Planning Obligations Supplementary Planning Document (2014), Policy DF1 of the London Plan (2021) and paragraphs 56 and 58 of the National Planning Policy Framework (2024).’*
- 9.15 Subject to approval of the current planning application, the applicant would enter into a Section 106 Agreement with the Council in respect of carbon offset, air quality, and project management and monitoring matters, therefor meeting the respective policies.

Reason for Refusal 5

- 9.16 *‘Insufficient detail has been provided to demonstrate that the required mitigation measures to protect neighbouring amenity in terms of odour pollution would not have a detrimental impact on the Grade II* Listed Building, or to determine that they do not require separate Listed Building Consent. As such, the required conditions to protect amenity cannot be attached to a grant of planning consent and the development is contrary to Policy SI1 of the London Plan (2021), Policy DMTC4 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies BE1 and EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012) and paragraphs 187(e) and 198 of the National Planning Policy Framework (2024).’*
- 9.17 To mitigate concerns related to the odour from the banquet hall and hotel, a flue has been proposed from the kitchen to a central system, as detailed in Section 7 of this Planning Statement and submitted Odour Assessment. This would ventilate to the roof level, ensuring that impacts are mitigated and there is no loss of amenity for neighbouring residents.
- 9.18 Furthermore, the submission also includes an Air Quality Assessment, which finds that the proposals do not lead to any negative impact on the air quality, create any high-risk exposure, and would be Air Quality Neutral. The use of the flue, which has no impact upon character, adds to an already policy-compliant proposal, and is fully in accordance with the London Plan policies SI 1, and Hillingdon Local Plan: Part 2 (2020) Policies DMTC 4, in addition to Hillingdon Local Plan (Part 1, 2012) policies BE1, and EM8.
- 9.19 The mitigation measures regarding odour have also been detailed and considered as part of the submitted Heritage Statement indicating that these measures would not cause any negative impact upon the Grade II* Listed Building. It is noted that any proposals to the listed building would require the appropriate consent however the information provided as part of this

application indicates this should not be the case, therefore in full compliance with the relevant policy.

Reason for Refusal 6

- 9.20 *‘The application submission fails to satisfactorily demonstrate that the proposed development would not give rise to an unacceptable detrimental impact upon the amenity of neighbouring occupiers, as a result of noise from its operation. As such, the development is contrary to Policy D14 of the London Plan (2021), Policy DMTC4 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020), Policies BE1 and EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (2012) and paragraphs 187(e) and 198 of the National Planning Policy Framework (2024)’.*
- 9.21 As outlined in the Principle of Development, a baseline acoustic survey conducted by Create Consulting Engineers considered that there were no significant noise-related constraints. A Noise Impact Assessment and Noise Management Plan have been submitted as part of this application which seeks to manage how potential noise impacts can be managed to ensure there is limited impact to neighbouring residential occupiers.
- 9.22 Furthermore, the development is expected to have a positive impact on the area. It is considered that the development's location is already within a high-noise location as well as its current permitted use as a nightclub with no planning restricted time limits. Its proximity to several other restaurants, shopping centres, and the town centre marks it as an area of activity with a minimum of moderate noise levels from day to night, and the proposed development will have no further negative impact on this.
- 9.23 As such, it is considered that the proposal is fully compliant with Hillingdon Local Plan: Part 2 (2020) Policy DMTC4, as well as Policies BE1 and EM8 of the Hillingdon Local Plan: Part 1 (2012). It is also considered to be compliant with Policy D14 of the London Plan, having certified the positive acoustic contribution to the area.

Summary

- 9.24 In light of the feedback received, the proposal has been modified and thoroughly verified to be fully in compliance with the policies previously assessed against as part of the initial application.
- 9.25 It is therefore considered that the current application has clearly addressed the previous reasons for refusal and should be approved.

10. Summary & Conclusion

- 10.1 This Planning Statement has been prepared on behalf of Frough Ltd in support of a full planning application and Listed Building Consent for the following proposal:

“Change of use of existing nightclub (Sui Generis) to a banqueting suite (Sui Generis) and development of a hotel (Use Class C1) including the change of use of existing gymnasium (Use Class E) and associated landscaping, car, and cycle spaces (Part retrospective).”

- 10.2 The site is located within the Uxbridge Ward of the London Borough of Hillingdon, occupying a prominent position along Uxbridge High Street. The L-shaped building has a strong presence within the townscape, with its glazed upper façade, canopy, and grand entrance referencing its former use as a cinema.
- 10.3 The majority of the site’s mass is located to the rear of the High Street frontage, with the main volume of the former cinema building positioned behind the street-facing terrace. The building was most recently in partial use as a nightclub and gym, with the gym occupying the western side of the structure. The area proposed for the new hotel development includes land formerly used as car parking associated with the gym.
- 10.4 The proposals are compliant with the relevant planning policies and will result in substantial enhancements to the condition and use of the site.
- 10.5 The scheme has benefitted from early and constructive pre-application discussions with the Council, as well as reflection after initial refusal, both of which have informed and improved the proposal. Alongside this, detailed technical assessments have ensured the development is both robust and deliverable, verifying full policy compliance.
- 10.6 The proposal will bring forward a range of planning benefits, including:
- Refurbishment and re-use of a currently vacant listed building
 - Introduction of high-quality architectural design
 - Increased landscaping and public realm enhancements
 - Sustainable and energy-efficient development
 - Contributing to Local Economic Growth
 - Accessibility and Inclusion
 - Immediately Deliverable Development
- 10.7 This is a well-considered scheme that will contribute positively to the local character, bring a long-vacant at-risk heritage asset back into active use, and support economic growth in the borough and the wider London region. Taken as a whole, the proposal aligns with national, regional, and local planning policy and will deliver a range of social, economic, and environmental benefits. The case for granting planning permission is strong, and the applicant is committed to bringing forward delivery without delay.