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WALSINGHAM PLANNING

SPECIALIST PLANNING & HERITAGE CONSULTANTS

Planning Statement

Premier Inn London Uxbridge,
Phase 500, Riverside Way,
Uxbridge UB8 2YF

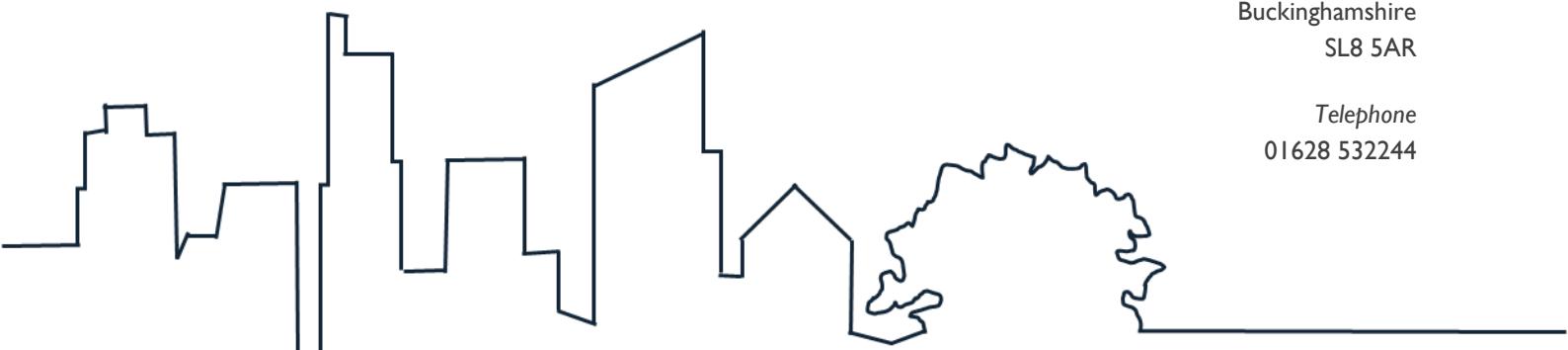
Demolition of existing hotel restaurant and
construction of new extension providing additional
hotel bedrooms and hotel restaurant, together with
alterations to the car park and all associated works

NOVEMBER 2024

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I INTRODUCTION

I.1 Walsingham Planning has been instructed by Premier Inn Hotels Ltd. to submit an application for full planning permission to the London Borough of Hillingdon for a two-storey extension to the Premier Inn London Uxbridge Hotel to create 70 additional bedrooms with associated landscaping. The description of development is as follows:

“Demolition of existing hotel restaurant and construction of new rear extension building providing additional hotel bedrooms and hotel restaurant, together with alterations to the car park and all associated works.”

I.2 Premier Inn has identified a considerable demand for additional budget hotel accommodation in this location. The proposal for additional bedrooms would meet Premier Inn's operational requirements at the location and help to address increased bedroom demand.

I.3 This report provides background information on the site and an assessment of the proposals in relation to planning policy and other material considerations, and is set out under the following sections:

- Chapter 2 provides the factual background to the site;
- Chapter 3 sets out the proposals and their evolution;
- Chapter 4 sets out the relevant planning policy and guidance;
- Chapter 5 discusses the planning issues and considerations; and
- Chapter 6 sets out the conclusion.

I.4 It is concluded that the proposals accord with the Development Plan such that planning permission should be granted.

Supporting Information

I.5 This Planning Statement should be read in conjunction with the following documents and drawings submitted in support of the application:

- Covering Letter
- Application Form

- Drawings prepared by Axiom, comprising:
 - 6262-P-001 Site Location Plan
 - 6262-P-002 Rev A Existing Site Plan
 - 6262-P-010 Rev F Proposed Site Plan
 - 6262-P-100 Existing Ground Floor Plan
 - 6262-P-101 Existing First & Second Floor Plans
 - 6262-P-102 Rev A Existing Roof Plan
 - 6262-P-110 Rev B Proposed Ground Floor Plan
 - 6262-P-111 Rev A Proposed First Floor Plan
 - 6262-P-112 Rev A Proposed Second Floor Plan
 - 6262-P-113 Rev A Proposed Roof Plan
 - 6262-P-200 Rev A Existing Elevations
 - 6262-P-210 Rev B Proposed Elevations (sheet 1 of 2)
 - 6262-P-211 Rev A Proposed Elevations (sheet 2 of 2)
 - 6262-P-212 Rev B Proposed Sections
- Planning Statement, prepared by Walsingham Planning
- Design and Access Statement, prepared by Axiom
- Energy Strategy, prepared by Thornley & Lumb
- Transport Statement and Travel Plan, prepared by RGP
- Noise Impact Assessment, prepared by Scotch Partners
- Flood Risk Assessment & Drainage Strategy Report, prepared by Simpson
- Detailed Landscape Proposals, prepared by Indigo
- Urban Greening Factor Calculations, prepared by Indigo

- Preliminary Ecological Appraisal and Roost Assessment, prepared by Arbtech
- Arboricultural Method Statement, including Impact Assessment and Tree Protection Plan, prepared by Arbtech
- Biodiversity Net Gain Assessment, prepared by Arbtech
- Fire Statement, prepared by C.S. Todd

2 SITE AND SURROUNDINGS

- 2.1 The application site is the Premier Inn London Uxbridge Hotel, located on the south side of Riverside Way and adjacent to the River Colne. Riverside Way is accessed from the A4007 St John's Road, a main route into Uxbridge from the west.
- 2.2 The site is currently arranged as an 80-bed hotel within a linear 3 storey block orientated east-west, and a 'Beefeater' restaurant within a single storey part of the building that sits in front of the main hotel building.
- 2.3 The principal elevation of the hotel faces north towards Riverside Way, with the main entrance located between the hotel and the restaurant parts of the building.
- 2.4 The main building is contemporary in its appearance featuring a flat roof with vertical bays across 3 storeys breaking up the massing and providing visual interest across the elevation. A central section of the hotel is brick and sits slightly higher than the wings projecting off it, breaking up the elevation and providing visual prominence to the central section and hotel entrance. The external finishes include multi yellow brickwork, and alternating bays of light grey composite metal cladding and darker grey aluminium frame curtain walling double glazing systems. The single storey beefeater restaurant is comprised of the same materials as the adjoining hotel, but with an increased use of glass due to the commercial nature of the building.



Front entrance viewed from Riverside Way, with the restaurant on the left



Front entrance, restaurant (left) and main building (right)



Rear elevation and car park, where the new extension will stand



Rear car park, where the new extension will stand

- 2.5 The site has two separate vehicular and pedestrian access points from Riverside Way on the northern and western sides of the site, which in turn has a junction with the A4007 a short distance to the east on the opposite side of the River Colne. At this junction a dedicated right turn lane is provided for vehicles entering Riverside Way from the north, ensuring traffic flow on the main road is not impeded.
- 2.6 Within the site there is a smaller car park at the front (north) and a larger car park behind (south) with an access road on the western boundary linking the front and rear parts of the site. Pavements on either side of Riverside Way allow guests to access the hotel on foot, with Uxbridge Town Centre a 10 minute walk away to the east.
- 2.7 The site is part of the wider Riverside Way Business Park which contains a range of commercial and warehousing units to the west and north of the hotel.
- 2.8 There are a number of mature trees enclosing the site to the east and south, along the banks of the River Colne. There are no TPOs on or adjacent to the site however. There is soft landscaping across the front of the site and within the site, principally around the entrance to the restaurant and hotel and within the car parks.

2.9 The building is not listed and is not located within a Conservation Area. A short distance to the east of the site, opposite the junction of Riverside Way with the A4007 on the opposite of the river, is the General Elliott public house, a Grade II listed building. This property also marks the western extent of the Uxbridge Moor Conservation Area. Further away to the south is the Church of St John, also Grade II listed.



Signage and entrance to Riverside Way Business Park, and the General Elliott public house

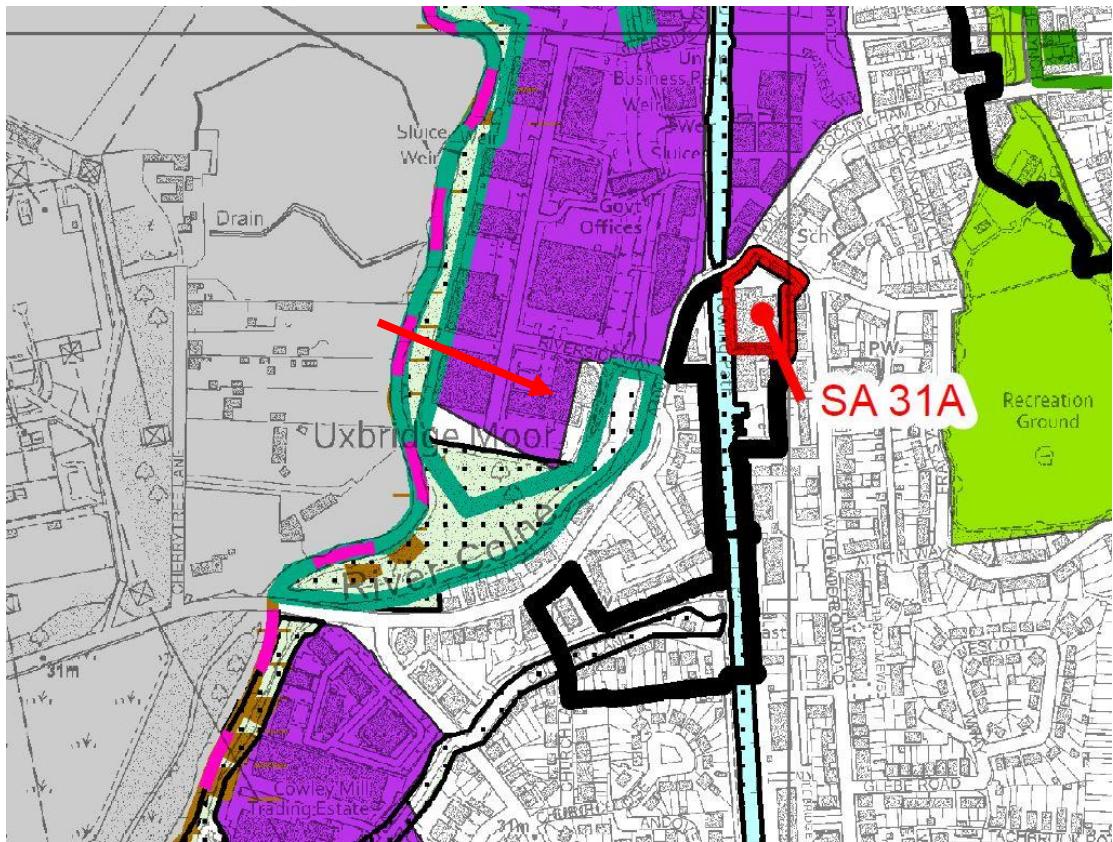
2.10 The site is a Strategic Industrial Location, part of the wider Riverside Way industrial area.

2.11 A small section of Green Belt lies immediately beyond the southern boundary of the site, and extends away to the west.

2.12 A Nature Reserve and Nature Conservation Site of Metropolitan or Borough Grade I Importance wraps around the site to the east and south (the immediate surroundings of the River Colne).

2.13 The site lies within an Air Quality Management Area.

2.14 There are no other proposals map designations.



Extract from the Council's Proposals Map showing the location of the site

- 2.15 The majority of the site is located within Flood Zone 1, the lowest risk of flooding. A small part of the site is Flood Zone 2, and adjacent to the site the River Colne and its banks are Flood Zone 3.
- 2.16 Despite having a PTAL of 0 (the lowest), the site can be easily accessed on foot from Uxbridge town centre. Uxbridge station is a 15 minute walk from the hotel, and the no.3 bus route operates between Uxbridge and Slough. The site benefits from good access to the primary road network. The A4007 runs past the site, and Junction 1 of the M40 is a short distance further north, a 5-minute drive from the hotel.

Planning History

- 2.17 Of principal relevance to this application is an overarching consent granted on 29/04/14 (ref. 56862/APP/2014/170) which included provision for a hotel as follows: “redevelopment of the site to provide 1 industrial unit (2361sqm) for B1(c), B2 and B8 uses and a 80 bedroom hotel (C1 use) with associated restaurant, bar and meeting facilities (755sqm), car parking, landscaping, lighting, plant and equipment and associated works.”

- 2.18 There are subsequent numerous applications to discharge conditions and have details approved in relation to this consent.
- 2.19 A non-material amendment to this consent was granted on 18/12/15 which included alterations to the main entrance and lobby of the restaurant (ref. 56862/APP/2015/3607).
- 2.20 Advertisement consent was granted on 30/12/14 (ref. 56862/ADV/2014/99) for the installation of various internally illuminated signage.

3 PROPOSED DEVELOPMENT

- 3.1 Premier Inn has identified a considerable demand for additional hotel accommodation in this location. Despite it only being consented in 2015, demand for high quality budget hotel accommodation continues to increase. The site lies within a Strategic Industrial Location – formerly the North Uxbridge Industrial and Business Area (IBA) – and is within easy walking distance to the many surrounding large scale commercial and industrial uses, and is well-located to serve Uxbridge Town Centre.
- 3.2 It is proposed to create additional hotel accommodation for the Premier Inn in the form of an extension to the existing hotel building. The proposed extension will be located to the south of the existing building which is currently occupied by a car park. It will physically adjoin the existing main hotel building at ground floor level, and at first and second floor level be physically separate from the main hotel except for a link corridor.
- 3.3 The new block will be 'L'-shaped and turn west along the southern boundary, and feature an undercroft car park with a building above at first and second floor levels.



Extract from Proposed Site Plan

- 3.4 The three storey extension will provide 72 bedrooms and includes a restaurant and bar for use by hotel guests. Overall the proposal will result in a hotel with 150 bedrooms, a net increase of 70.
- 3.5 The main entrance to the hotel and reception area will be moved to within the centre of the existing main block, and run through to a second entrance on the western side of the new block. It will form a link between the original hotel and the new extension at ground floor level.
- 3.6 Accessed off this newly reconfigured reception area to the south is the new bar and restaurant area, and 'behind' this (to the east) are back of house facilities such as the kitchen and storage areas.



CGI of proposed new extension and entrance

- 3.7 The proposals include other internal reconfiguration works which would not require planning permission but are shown on the plans for completeness and to aid in understanding how the newly reconfigured hotel will operate.
- 3.8 The new block will be three storeys in height, to match the existing building. The extension will be finished in materials to match the existing, including multi yellow brickwork with natural coloured mortar, composite metal cladding, metal fascia and soffit, and aluminium frame

curtain walling double glazing systems. Full materials details are stated on the proposed elevation drawings.

- 3.9 The proposal would result in the loss of some existing landscaping features within the existing southern car park to accommodate the proposed extension. New landscaping and tree planting is proposed across the site, principally in the area vacated by the restaurant building and replaced by the car park and new servicing bay. Full details of the proposal are shown in the detailed hard and soft landscaping scheme.
- 3.10 No alterations to the existing access are proposed, however there will be some alterations to existing parking provision. The car parking spaces to be lost at the rear will be reprovided at the front of the site, and 139 provided in total. This is a net increase of 23 spaces on existing, to reflect the additional hotel bedrooms but also the loss of the restaurant.

4 PLANNING POLICY

- 4.1 Section 38(6) of the 2004 Planning & Compulsory Purchase Act requires that determination of any planning application must be in accordance with the development plan, unless material considerations indicate otherwise.
- 4.2 In this case the Development Plan comprises The London Plan (2021); and the London Borough of London Borough of Hillingdon's Local Plan Part 1 Strategic Policies (Nov 2012), Local Plan Part 2 Development Management Policies (Jan 2020), and Local Plan Part 2 Site Allocations and Designations (Jan 2020).
- 4.3 The Council are in the early stages of producing a new Local Plan, and a Regulation 18 'Call for Views' consultation completed in June 2024. Examination is not scheduled until 2026, with adoption expected to be in 2026/2027.
- 4.4 The National Planning Policy Framework and associated guidance is also highly relevant to this application. In July 2024 the Government published a new consultation on proposed changes to the National Planning Policy Framework. Amongst other things changes include changes to previously developed land, brownfield land, Green Belt policy and the introduction of the "Grey Belt". These changes are discussed below.

National Planning Policy Framework (December 2023)

- 4.5 The National Planning Policy Framework sets out the Government's intention for the planning system to contribute to the achievement of sustainable development, performing an economic, social and environmental role.
- 4.6 At the heart of the NPPF is a presumption in favour of sustainable development (Paragraph 11) which for decision-taking means that development proposals that accord with the development plan should be approved without delay.

Transport and Highways

- 4.7 Section 9 relates to promoting sustainable transport. Paragraph 114 states that in assessing specific applications for development, it should be ensured that:
 - a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

- b) *safe and suitable access to the site can be achieved for all users;*
- c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree*

4.8 Paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Making Effective Use of Land

4.9 Section 11 is concerned with making effective use of land, and Paragraph 123 states that “*planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.*” Paragraph 124(c) continues that planning policies and decisions should “*give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs*”.

4.10 Paragraph 128 relates to achieving appropriate densities, specifically it sets out that planning decisions “*should support development that makes efficient use of land*”.

Design

4.11 Section 12 seeks to achieve well-designed and beautiful places. Paragraph 131 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 to creating sustainable development and making better places for people to live and work in, helping to make development acceptable to communities.*”

4.12 Paragraph 135 continues, stating that planning policies and decisions should ensure that developments:

- a. “*will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

- b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.”

4.13 Paragraph 136 sets out guidance on trees, emphasising the important contribution they make to the character and quality of urban environments and how they can also help mitigate and adapt to climate change.

4.14 Finally, paragraph 139 states:

“Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes.”

Green Belt

4.15 Paragraph 143 states that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and

- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Biodiversity and the natural environment

4.16 Section 15 seeks to conserve and enhance the natural environment. Paragraph 180 states how “*planning policies and decisions should contribute to and enhance the natural and local environment by*” amongst other things “*d) minimising impacts on and providing net gains for biodiversity.*”

4.17 Paragraph 186 continues, stating that “*When determining planning applications, local planning authorities should apply the following principles ... while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.*”

Emerging NPPF (July 2024)

4.18 The government is currently consulting on changes to the NPPF which amongst other things seeks to relax rules around development in or affecting the Green Belt in specific circumstances, including the introduction of the “Grey Belt”.

4.19 Paragraph 151(g) amends what is not inappropriate development in the Green Belt. Part (g) now simply states an exception to include:

Limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.

4.20 A new paragraph is introduced at paragraph 152, which states:

In addition to the above, housing, commercial and other development in the Green Belt should not be regarded as inappropriate where:

- a. *The development would utilise grey belt land in sustainable locations, the contributions set out in paragraph 155 below are provided, and the development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole; and*
- b. *The local planning authority cannot demonstrate a five year supply of deliverable housing sites (with a buffer, if applicable, as set out in paragraph 76) or where the Housing Delivery Test indicates that the delivery of housing was below 75% of the*

housing requirement over the previous three years; or there is a demonstrable need for land to be released for development of local, regional or national importance.

- c. *Development is able to meet the planning policy requirements set out in paragraph 155.*

4.21 Grey Belt is defined by the new NPPF consultation document as:

For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).

4.22 For completeness, the definition of “previously developed land” remains unchanged:

Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

London Plan (2021)

- 4.23 Policy D3 seeks to optimise site capacity through the design-led approach to determine the most appropriate form. The policy continues with paragraph D11 stating that development should “*respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.*”
- 4.24 Policy D4 relates to delivering good design, it states that Design & Access Statements should demonstrate the that the proposal meets the design requirements of the London Plan. Proposals’ design should be thoroughly scrutinised by borough planning, urban design, and conservation officers.

4.25 Policy D12 states that all development proposals must achieve the highest standards of fire safety. It goes on to state that all major developments should be submitted with a Fire Statement, produced by a third party, suitably qualified assessor.

4.26 Policy E10 seeks to strengthen London's visitor economy, emphasising the importance of tourism to London's economy and the need to cater to the accommodation demands of tourists by providing an additional 58,000 bedrooms over the plan period, or 2,230 hotel bedrooms per annum.

4.27 Policy E11 seeks to support employment, skills development, apprenticeships and other education and training opportunities in both the construction and end-phases of development.

4.28 Policy G2 concerns London's Green Belt. It states that "the Green Belt should be protected from inappropriate development and "*development proposals that would harm the Green Belt should be refused except where very special circumstances exist*".

4.29 Policy G6 states that development should manage impacts on biodiversity and aim to secure net biodiversity gain.

4.30 Policy G7 seeks to retain trees wherever possible, where trees are to be removed there should be adequate replacement.

4.31 Policy SI2 sets out carbon reduction targets where a minimum of 35% onsite reduction is required, and the Mayor's energy hierarchy of be lean, be clean, and be green. Development should be net zero-carbon and proposals should include a detailed energy strategy to demonstrate how this will be met.

4.32 Policy SI12 requires that flood risk is minimised and mitigated.

4.33 Policy T1 states that development should make the most effective use of land, reflecting its connectivity and accessibility.

4.34 Policy T4 requires the submission of a Transport Assessment. The policy also sets out the importance of proposals not increasing road danger.

4.35 Policy T5 encourages cycling and sets out the minimum standards for cycle parking.

4.36 Policy T6 relates to car parking, it sets out that provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.

4.37 Policy T6.4 sets out hotel and leisure parking standards. In locations of PTAL 0-3 schemes should be assessed on a case-by-case basis.

4.38 Policy T6.5 requires hotel developments to have disabled parking at 6% designated bays and 4% enlarged bays.

4.39 Policy T7 requires adequate space for safe, clean, and efficient servicing and deliveries. Developments should be designed so that deliveries can be received outside of peak hours.

Hillingdon's Local Plan (Parts 1 and 2)

Land Use

4.40 Policy DME 5 'hotels and visitor accommodation' states:

"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, subject to:

- i. *A high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and the streetscape;*
- ii. *Provision of an accessible layout and rooms in accordance with Policy DME 6: Accessible Hotels and Visitor Accommodation; and*
- iii. *No adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion."*

4.41 Policy DME 6 concerns accessible hotels and visitor accommodation and requires inclusive access to have been incorporated into the proposal from the outset, and for 10% of hotel rooms to meet wheelchair accessibility standards.

Design

4.42 Policy DMHB 11 concerns the design of new development and states:

- A) *All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including*

i. *harmonising with the local context by taking into account the surrounding:*

- *scale of development, considering the height, mass and bulk of adjacent structures;*
- *building plot sizes and widths, plot coverage and established street patterns;*
- *building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*
- *architectural composition and quality of detailing;*
- *local topography, views both from and to the site; and*
- *impact on neighbouring open spaces and their environment*

ii. *ensuring the use of high quality building materials and finishes;*

iii. *ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;*

iv. *protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings; and*

v. *landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.*

B) *Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space*

C) *Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development⁵ sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs*

D) *Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for*

collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours

4.43 Policy DMHB 12 'streets and public realm' states:

A) *Development should be well integrated with the surrounding area and accessible. It should:*

- i. *improve legibility and promote routes and wayfinding between the development and local amenities;*
- ii. *ensure public realm design takes account of the established townscape character and quality of the surrounding area;*
- iii. *include landscaping treatment that is suitable for the location, serves a purpose, contributes to local green infrastructure, the appearance of the area and ease of movement through the space;*
- iv. *provide safe and direct pedestrian and cycle movement through the space;*
- v. *incorporate appropriate and robust hard landscaping, using good quality materials, undertaken to a high standard;*
- vi. *where appropriate, include the installation of public art; and*
- vii. *deliver proposals which incorporate the principles of inclusive design. Proposals for gated developments will be resisted.*

B) *Public realm improvements will be sought from developments located close to transport interchanges and community facilities to ensure easy access between different transport modes and into local community facilities.*

4.44 Policy DMHB 15 'planning for safer places' requires "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. Where relevant, these should be included in the Design and Access Statement."

Highways, transport, and parking

4.45 Policy DMT 1 'managing transport impacts' states:

Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:

- i. *be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;*
- ii. *maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;*
- iii. *provide equal access for all people, including inclusive access for disabled people;*
- iv. *adequately address delivery, servicing and drop-off requirements; and*
- v. *have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network*

4.46 The Policy also requires a Transport Assessment and Travel Plan be undertaken and submitted alongside any application on a scheme of this size.

4.47 Policy DMT 2 ‘highways impacts’ requires development proposals to ensure that:

- i. *safe and efficient vehicular access to the highway network is provided to the Council’s standards;*
- ii. *they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;*
- iii. *safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;*
- iv. *impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and*
- v. *there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity*

4.48 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*” and requires the provision of cycle parking and changing facilities in accordance with Appendix C, Table 1 of the LPP2 or, in agreement with Council.

4.49 Policy DMT6 ‘vehicle parking’ states:

- A) *Development proposals must comply with the parking standards outlined in Appendix C Table 1 in order to facilitate sustainable development and address issues relating to congestion and amenity. The Council may agree to vary these requirements when:*
 - i. *the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity; and/or*
 - ii. *a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations*
- B) *All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users and those with restricted mobility in accordance with the Council’s Accessible Hillingdon SPD.*

4.50 Appendix C of the Local Plan Part 2 sets out the Council’s Parking Standards. Full details are set out within the Transport Assessment in terms how the development meets these standards.

Environment, Energy, and Sustainability

4.51 Policy DME1 1 ‘living walls and roofs and on-site vegetation’ states:

All development proposals are required to comply with the following:

- i. *All major development should incorporate living roofs and/or walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided; and*
- ii. *Major development in Air Quality Management Areas must provide onsite provision of living roofs and/or walls. A suitable offsite contribution may be required where onsite provision is not appropriate.*

4.52 Policy DME1 2 Reducing Carbon Emissions

- A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.
- B) All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.
- C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.

4.53 Policy DMEI 14 sets out the council's policy on air quality and states:

- A) 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.
- B) Development proposals should, as a minimum:
 - i. be at least "air quality neutral";
 - ii. include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and
 - iii. actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

Flooding and Drainage

4.54 Policy DMEI 9 'management of flood risk' states:

- A) Development proposals in Flood Zones 2 and 3a will be required to demonstrate that there are no suitable sites available in areas of lower flood risk. Where no appropriate sites are available, development should be located on the areas of lowest flood risk within the site. Flood defences should provide protection for the lifetime of the development. Finished floor levels should reflect the Environment Agency's latest guidance on climate change.
- B) Development proposals in these areas will be required to submit an appropriate level Flood Risk Assessment (FRA) to demonstrate that the development is resilient to all sources of flooding.

- C) *Development in Flood Zone 3b will be refused in principle unless identified as an appropriate development in Flood Risk Planning Policy Guidance. Development for appropriate uses in Flood Zone 3b will only be approved if accompanied by an appropriate FRA that demonstrates the development will be resistant and resilient to flooding and suitable warning and evacuation methods are in place.*
- D) *Developments may be required to make contributions (through legal agreements) to previously identified flood improvement works that will benefit the development site.*
- E) *Proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.*

Trees and Ecology

4.55 Policy DMEI 7 'biodiversity protection and enhancement' states:

- A) *The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site. Where loss of a significant existing feature of biodiversity is unavoidable, replacement features of equivalent biodiversity value should be provided on-site. Where development is constrained and cannot provide high quality biodiversity enhancements on-site, then appropriate contributions will be sought to deliver off-site improvements through a legal agreement.*
- B) *If development is proposed on or near to a site considered to have features of ecological or geological value, applicants must submit appropriate surveys and assessments to demonstrate that the proposed development will not have unacceptable effects. The development must provide a positive contribution to the protection and enhancement of the site or feature of ecological value.*
- C) *All development alongside, or that benefits from a frontage on to a main river or the Grand Union Canal will be expected to contribute to additional biodiversity improvements.*
- D) *Proposals that result in significant harm to biodiversity which cannot be avoided, mitigated, or, as a last resort, compensated for, will normally be refused*

4.56 Policy DMHB 14 'trees and landscaping' states:

- A) *All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.*

- B) *Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.*
- C) *Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.*
- D) *Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.*

4.57 The application of the policies and guidance set out above is discussed in detail in the next chapter.

5 PLANNING ASSESSMENT

Sustainable Development

- 5.1 The NPPF makes it clear that sustainable development has three overarching objectives: an economic objective to help build a strong, responsive and competitive economy; a social objective to support strong, vibrant and healthy communities; and an environmental objective to contribute to protecting and enhancing our natural, built and historic environment.
- 5.2 The proposed hotel extension would support each of these three objectives. The existing Premier Inn hotel is a well-used facility providing overnight accommodation for tourists and business travellers. There is demand for additional hotel bedrooms which would create additional employment opportunities during the operational and construction phases, as well as supporting third party suppliers.
- 5.3 The proposed extension would be built on previously developed brownfield land and would make more efficient use of the site without needing to expand outside the existing curtilage.
- 5.4 As demonstrated throughout this submission, there would be environmental enhancements to the site through the provision of new planting and a significant Biodiversity Net Gain.
- 5.5 As such, the proposed hotel extension would bring economic, social and environmental benefits.

Principle of Development

- 5.6 The site is located within the built up area of Uxbridge, albeit adjacent to the Green Belt. It is for the most part entirely built out, either with a physical building or car parking. Permission is sought for the demolition of the existing hotel restaurant, and the erection of an annexe extension to provide additional bedrooms to serve the hotel on previously developed land.
- 5.7 The principle of a hotel in this location was assessed under application 56862/APP/2014/170 where it was concluded it would be compatible with and actively support the surrounding commercial and business uses of the Riverside Way Estate.
- 5.8 As set out above, Premier Inn have identified this location to have demand for additional hotel bedroom capacity, it is a successful hotel that has actively supported the surrounding uses since its construction. At the same time, the Beefeater restaurant has not fulfilled its potential and is underutilised, it occupies a large part of the site and fails to make optimal use of the

site. Optimising the capacity and realising the potential of previously developed brownfield sites such as this one is supported by all levels of planning policy, it is by definition sustainable development.

- 5.9 An extension to the existing hotel represents sustainable economic growth both within the application site and in support of the local area, in accordance with all levels of policy.
- 5.10 There would be economic benefits from the proposed additional hotel rooms, to make more efficient use of land. The existing restaurant forms part of the hotel complex to principally serve hotel guests and the loss of this facility would be offset through the creation of a new hotel restaurant within the existing hotel building.
- 5.11 A hotel is classified as a town centre use which would normally require the sequential test to be passed. However, this is not a new hotel. It is an established hotel in a sustainable location which fulfils an important function in providing overnight accommodation for business and leisure travellers visiting the Estate, visiting Uxbridge, or using the surrounding road network more generally. It should also be emphasised that Premier Inn's town centre hotel cannot be extended, it is this Riverside Way location which provides the opportunity for additional hotel bedrooms.
- 5.12 The proposal seeks planning permission to facilitate works to allow for an increase in bedrooms to an existing successful hotel. An extension of this scale would not be built in isolation, and a sequential test is not therefore considered necessary or appropriate in this instance. Furthermore, a sequential test was not deemed necessary as part of the previous application for the hotel use on this site (a sequential test was required for the restaurant use only).
- 5.13 As such, there is no policy reasoning that the demolition of the existing hotel restaurant, and the erection of a 72-bed extension should not be supported at this location. The proposals comply with Local Plan Policies DME 5 & DME 6; London Plan policies D3, E10, E11 & T1; and paragraphs 123, 124, and 128 of the NPPF.

Impact on the Green Belt

- 5.14 The site does not lie in the Green Belt but is adjacent to it, and views from the Green Belt towards the site and the impact of development on the openness of the Green Belt were considerations at the time of application 56862/APP/2014/170 being determined.

5.15 The government is consulting on a new NPPF which seeks to relax rules around development in or affecting the Green Belt in specific circumstances. The proposed introduction of the “Grey Belt” and the acceptability of development on these sites has implications for sites such as this.

5.16 Amended paragraph 51(g) now defines the following as not inappropriate development in the Green Belt:

“partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt”

5.17 It follows therefore that if it is not inappropriate development in the Green Belt, it would also not be inappropriate development adjacent to the Green Belt.

5.18 Clearly, what constitutes “substantial harm” is a subjective judgement. However, the site is heavily screened and views from the Green Belt are extremely limited. The new extension will be read in the context of the existing 3 storey hotel on the site, and the site itself read within the context of the wider estate and adjacent industrial and commercial buildings of which it forms a part. The new extension will not cause substantial harm to the openness of the Green Belt.

5.19 The location where the new extension is to be constructed is on the site of a car park, physically adjacent to and adjoining the existing main hotel building. The part of the site on which the extension is proposed is previously developed land, and the new built form would be read as part of the built form and massing already on the site in this location. The site is screened by mature trees and vegetation. For this reason the extension would not have a greater impact on the openness of the Green Belt from local or longer distance views.

5.20 The development would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole, and the development would be in accordance with the NPPF Tests of the purpose of the Green Belt set out at paragraph 143 of the Framework:

- a) It does not represent unrestricted sprawl of large built-up areas. It is an extension to an existing hotel, and replaces a building on the site.
- b) Similarly, a extension will not result in neighbouring towns merging into one another. The gap between the settlements will be maintained and experienced as existing.

- c) No countryside will be encroached upon. The extension will be constructed on previously developed land where a car park is currently situated.
- d) As above, no historic towns or their setting will be impacted by the rear extension.
- e) The proposal represents the efficient use of previously developed land.

5.21 Accordingly, the proposal will be in accordance with London Plan Policy G2, the provisions of the current NPPF, and in accordance with the provisions of the emerging draft NPPF, specifically paragraphs 151(g), 152 & Glossary. It is a proportionate extension on previously developed land, it will not impact on the openness of the Green Belt, and the 5 purposes of the Green Belt are upheld.

Design and Appearance

5.22 The proposal seeks consent for the demolition of the existing Beefeater Restaurant, replacement with a surface level car park, and the erection of an annexe extension to the existing hotel at the rear of the site within the existing car park, behind the building and occupying a similar footprint to the restaurant. As such, it would be sited wholly on previously developed land.

5.23 This application is accompanied by a Design and Access Statement by Axiom Architects, which sets out the design rationale of the proposals and proposed materials.

5.24 The restaurant element of the building would be removed and replaced with a surface level car park and landscaping, particularly along the border and frontage. The result will be removing built form from the immediate street scene and relocating it to the rear of the site. the visual impact of the restaurant and hotel when viewed from the surrounding streets will be reduced.

5.25 The new extension is located entirely behind the existing hotel building, and will be the same height, scale, and massing. As such, the proposal would not appear overly prominent or dominant, nor at odds with the remainder of the site. It will be read as a new wing to the hotel that matches the host building closely. Being situated on an existing car park means it would be sited wholly on previously developed land.

5.26 The proposed extension is designed as a continuation of the existing hotel, matching the materials and form to create a unified appearance. As such, the proposals would complement

the host building and would assimilate well into this part of the Estate where visible, noting the scale and appearance of nearby commercial uses or warehousing uses.

- 5.27 A single storey link block with a smaller link block at first and second floor levels above sits between the existing hotel and the new annexe. The result is that the form and elevations are broken up, and the new extension will sit slightly separate to the south of the existing main hotel building.
- 5.28 The proposed materials will match the existing, including replicating the solid to void ratios of the elevations and proportions of the bays along the elevations. The finishes include multi yellow brickwork with natural coloured mortar, composite metal cladding, metal fascia and soffit, and aluminium frame curtain walling double glazing systems. The result is creating visual interest and match the form and appearance of the existing hotel.
- 5.29 Consequently, the design of the proposal complies with Local Plan Policies DMHB 11 & DMHB 12; London Plan policies D4 and D12; and paragraphs 131, 135, and 139 of the NPPF.

Heritage Assets

- 5.30 The NPPF requires an appraisal of the Heritage Asset proportionate to its value and with the nature of the proposal. Paragraph 200 states that “*in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance*” (Our emphasis).
- 5.31 The existing building is not statutorily or locally listed, nor is it located within a designated conservation area or World Heritage Site.
- 5.32 A short distance to the east of the site, opposite the junction of Riverside Way with the A4007 on the opposite of the river, is the Grade II listed General Eliot public house. This property also marks the western extent of the Uxbridge Moor Conservation Area. Further away to the south is the Church of St John, also Grade II listed. There is existing intervening vegetation between the site and these assets which largely obscures views, particularly the case with the Church of St John to the south.
- 5.33 The proposed removal of the restaurant from the front of the site and construction of a new extension at the rear of the site, heavily screened by existing extensive mature trees and

vegetation, will result in the hotel having less visual impact on the listed building and conservation area than existing.

- 5.34 In any event, whilst the existing arrangement is not judged to be an element of the wider setting of these heritage assets, the proposals would not affect the aspects of the setting of the heritage assets from which they derive their significance. The restaurant element would be removed from this setting and longer distance views from the Conservation Area, and the new extension would be heavily screened.
- 5.35 As such, it is considered the proposals would have a neutral effect, preserving the setting of both the General Eliot public house, the Church of St John, and preserving the character and appearance of the Uxbridge Moor Conservation Area.
- 5.36 Having regards to the tests within the NPPF, Paragraph 208 states that “*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*”
- 5.37 Whilst the NPPF only refers to “substantial” and “less than substantial” harm, the latter is applicable by these limited criteria. Paragraph 208 of the NPPF is therefore engaged.
- 5.38 It is not considered that there will be any harm to the significance of any designated heritage assets.
- 5.39 The (extremely limited) heritage benefits and the public benefits presented by the scheme – removing the restaurant from the wider longer distance setting, improving the hotel’s function, and improving the attractiveness of the hotel to guests – outweighs any possible impact on designated heritage assets when assessing the proposals against the “substantial” or “less than substantial” tests of the NPPF.
- 5.40 The proposal is therefore considered to accord with Policy H1 of the London Plan; and paragraphs 200 and 208 of the NPPF.

Trees & Landscaping

- 5.41 An Arboricultural Impact Assessment, Arboricultural Method Statement, Tree Protection Plan and Tree Survey Report have been submitted with this application, which assesses the impact to trees on site.

5.42 Whilst the new extension is located on an existing hard surfaced car park, this car park includes a series of decorative trees. Furthermore, there are trees, hedges, and vegetation around the perimeter of the site which has the potential to be affected by the proposed development.

5.43 The proposal requires the removal of 13 No. category C trees from within the existing car park, and the partial felling of a group of Category B trees in the south east corner of the site. Full details are shown on the Arboricultural Impact Assessment drawing.

5.44 Tree protection measures will be in place where necessary during the construction phase.

5.45 A detailed landscaping scheme has also been submitted with this application, that sets out the proposed hard and soft landscaping. The loss of 13 trees and a small part of a Group will be mitigated through the introduction of new native tree planting within the site and via a landscaping scheme which includes native tree and shrub species. The supporting landscaping scheme provides 34 replacement trees, as well as extensive replacement landscaping and shrub planting.

5.46 Policy DMEI I requires major development proposals to include living walls and/or green roofs where practical and appropriate. However these features are specialist, heavy, and require significant structural adjustments to incorporate them into schemes, which impacts the viability of development. They require significant ongoing maintenance, which also impacts scheme viability.

5.47 Furthermore, living walls pose a fire risk. Premier Inn have been undertaking a review of their entire portfolio post-Grenfell and have taken the operational decision to not include green walls in their developments.

5.48 London Plan Policy G5 requires commercial developments to achieve an Urban Greening Factor target score of 0.3. It should be emphasised that this is a target, and that the development achieves a score of 0.251, slightly short of this figure.

5.49 The extensive soft landscaping proposals and significant increase in Biodiversity Net Gain that is achieved by the development – discussed further below – is a significant enhancement and benefit to the site compared to existing, and taken in the planning balance in terms of trees, landscaping, biodiversity, and overall greening of the site is considered to outweigh this marginal non-compliance with Policy with regards to providing a living wall and falling slightly short of the target score of 0.3.

5.50 Overall, the proposed landscaping scheme would enhance the existing soft landscaping provision on site. Whilst 13 trees and part of 1 Group will need to be removed, 34 new replacement trees are proposed to offset any impact. As such, on balance, the proposals comply with Local Plan policies and guidance within the NPPF.

Flooding and Surface Water Drainage

5.51 This application is accompanied by a Flood Risk Assessment and Drainage Strategy Report by Simpson TWS, which assesses the flood risk associated with the development proposals and details the proposed strategy for the disposal of foul and surface water runoff from the development.

5.52 The application site lies within Flood Zone 1, which is the lowest risk. The site is not at risk of fluvial flooding, however the FRA confirms that the site has been established to be potentially affected by surface water flooding. However, in this regard, the FRA states:

“Although the mapping for surface water flooding does not account for the presence of gullies and linear drainage channels in the areas shown to be at risk which would alleviate the flooding shown and as such the actual risk is anticipated to be low. In addition, the use of SuDS as well as a raised floor level for the extension would protect the extension from such flooding, the extension is also located away from the surface water flood risk zones.”

5.53 The FRA continues, concluding that *“the site is assessed to be at low risk of flooding from all other sources considered in the Strategic Flood Risk Assessment. On this basis, no measures are deemed necessary to manage flood risk on the development other than the use of SuDS.”*

5.54 The existing foul drainage network on the site will be retained, and the new extension would be provided with a new foul water drainage system with connections made from the proposed extension to the existing network.

5.55 Overall, the proposed development can be occupied and operated safely, will not increase the level of flood risk to the site or neighbouring sites, and the scheme is acceptable in terms of drainage strategy and flood risk, in accordance with Local Plan policies and guidance within the NPPF.

Highways, Transport and Parking

5.56 The existing situation on site is a 80-bedroom hotel and associated Beefeater restaurant, and 116 vehicle parking spaces.

5.57 The proposal will increase the number of bedrooms to a total of 150, remove the restaurant use from the site, and increase the number of parking spaces to 136.

5.58 The application is accompanied by a Transport Assessment and Travel Plan by RGP, which confirms that 136 spaces would be sufficient to accommodate the post-development parking demand. The parking requirement and trip generation associated with 70 additional bedrooms is for the most part offset by the removal of the restaurant from the site.

5.59 4 long-stay and 2 short-stay bicycle parking spaces are provided in accordance with standards.

5.60 The site is conveniently located for key transport links, including the A4007 immediately adjacent to the site, the A40 and Junction 1 of the M40.

5.61 Riverside Way and St John's Road (the A4007) benefit from footways on both sides, meaning the site can be easily accessed on foot from Uxbridge town centre. Uxbridge station is a 15 minute walk from the hotel, and the no.3 bus route operates between Uxbridge and Slough.

5.62 The site features two vehicle entry/exit points onto Riverside Way, providing drivers with options and to spread out vehicle movements across the site and across Riverside Way. There is signage to direct customers to an additional area of car parking to the rear of the site if required.

5.63 The removal of the restaurant from the site and construction of a new extension to provide 70 additional bedrooms will not give rise to excessive vehicle movements which would adversely impact on highway safety. The frequency of deliveries will not increase.

5.64 The site is easily accessible and safely accessed in any event. Riverside Way is a modern road built to modern standards, and serves only the Riverside Way Estate. Its junction with the A4007 features a dedicated right turn lane for southbound traffic, ensuring there is no impediment to traffic flow on the primary route.

5.65 Finally, the internal site layout would continue to provide sufficient space for delivery vehicles to manoeuvre and for vehicles to park.

5.66 The Transport Statement concludes:

- There is an overall reduction in vehicle movements across the course of a typical day, 324 down from 426.

- the proposed 139 parking spaces would be sufficient to accommodate the likely parking demand to be generated post-development.
- The internal site layout would continue to provide sufficient space for delivery vehicles to manoeuvre, and vehicles to enter and egress parking spaces.
- The size and frequency of delivery vehicles to the site would not increase post-development.

5.67 The proposed development is acceptable in terms of parking, practical and safe operation, and highway safety. Any impact, however minor, is certainly not “severe” as per the test of the NPPF.

5.68 The proposal is also supported by a Travel Plan which includes a range of measures to increase sustainable modes of travel to the site. Site infrastructure measures include:

- Co-located facilities such as on-site breakfast room or restaurant, catering for guest breakfasts or evening meals respectively, reducing the need to travel off site;
- Provision of level access to the reception area and specially adapted rooms allowing easier access for customers with disabilities. Where required, access ramps, dropped kerbs and tactile paving will be provided;
- All Premier Inn hotels are bike friendly. Clean bikes with dirt-free tyres are allowed to be kept in guest bedrooms or stored away safely. The reception team will point guests to local bike washing facilities should this be required. Cycle maintenance tools including bicycle pumps and puncture repair kits are available from reception;
- Premier Inn provide adequate shower and changing facilities for those staff commuting by active travel. Lockers are provided in the team / staff room for the storage of clothing and cycling equipment.
- All Premier Inn hotels provide free Wi-Fi, which may be connected to for access to travel related websites, for example; and
- Amazon have the option to provide Amazon Lockers within Premier Inn hotels. These are accessible to all, including the local community, 24 hours a day.

5.69 Full details are set out in the Travel Plan.

5.70 The proposal is in accordance with Local Plan Policies DMT 1, DMT 2, DMT 5, & DMT 6; London Plan Policies T1, T4, T6.4 & T.6.5; and paragraphs 114 & 115 of the NPPF.

Ecology and Biodiversity

5.71 This application is accompanied by a Preliminary Ecological Appraisal and Roost Assessment and a Biodiversity Net Gain Note and Biodiversity Metric by Arbtech.

5.72 The proposed extension would be built on the site of an existing car park and would not encroach into undeveloped parts of the site.

5.73 The existing building on the site and the existing ornamental trees on the site which are the subject of removal offer negligible habitat value for roosting bats and negligible habitat value for nesting birds. No evidence of any roosting or nesting was found on site. Therefore the PEA concludes that there is no requirement for any follow-up survey work.

5.74 The site is not subject to any statutory wildlife designations, however, does lie adjacent to a Nature Reserve and Nature Conservation Site of Metropolitan or Borough Grade I Importance. The report states that no direct impacts to these sites are anticipated from the construction or operation of the proposals.

5.75 Subject to the recommendations set out within the PEA that will be adhered to during the construction phase, it is concluded that the proposals are unlikely to impact any protected species.

5.76 Regarding the statutory requirement for the provision of 10% Biodiversity Net Gain (BNG), the proposal is supported by a BNG Report and Metric prepared by Arbtech which confirms that the proposed development would result in a 36.3% net gain in habitat units, and a 56.46% gain in hedgerow units.

5.77 As such, the proposed development would significantly exceed the required 10% Net Gain in biodiversity and would not have a detrimental impact on any protected species. Best practices would be followed during construction works to minimise the impact of the works and there would be no unacceptable impact to the adjacent Nature Reserve and Nature Conservation Site, in accordance with policies DME 7 of the Local Plan, and S12 of the London Plan.

Sustainability and Energy

5.78 The proposal is supported by an Energy Strategy which outlines how the design of the development has been informed by reducing carbon emissions and improving energy efficiency.

5.79 The proposal will follow sustainable and environmentally friendly building methods, including the use of locally sourced and recycled materials where possible, the use of local labour during construction periods and enhancement on Building Regulation requirements relating to U values.

5.80 The Energy Strategy confirms that “the proposed development has followed the GLA’s energy hierarchy to qualify the carbon emissions reduction targets have been met”, and concludes:

- *An all-electric building services strategy is proposed due to the adverse effect on local air quality proposed by decentralised or on-site combustion building services.*
- *This will ensure lower carbon emission at present, and increasingly reduced carbon emissions as the electricity grid decarbonises.*
- *The overall development’s carbon emissions will be reduced to 28.4 CO2 TPA which is a reduction of 0.31% below the Part L 2021 baseline.*
- *The energy hierarchy carbon reduction methodology has minimised energy usage and carbon emissions of the proposed Premier Inn Uxbridge Bedroom Extension to provide a sustainable low energy building.*

5.81 Consequently, proposed carbon reduction strategy implemented in the design of the development will minimise the energy usage of the building and carbon emissions ensuring the proposed extension provide a sustainable low energy building in accordance with Local Plan Policy DMEI 1 and London Plan Policy S12.

Servicing and Amenity

5.82 The additional hotel bedrooms would not increase the existing frequency of refuse collections as set out in the submitted Transport Statement.

5.83 There would continue to be a secure refuse store with bins allocated for general waste, glass waste and mixed dry recycling.

5.84 It is not considered that the additional rooms would require an increase in the size or frequency of servicing vehicles, with any additional demand met through existing visits.

5.85 Delivery and service vehicles would continue to access the site via Riverside Way and undertake deliveries and refuse collections within the site curtilage and as such, would not cause a nuisance to neighbouring properties, nor impact upon the public highway.

5.86 The nearest residential properties to the site are located a considerable distance away from the site to the east, on the other side of the River Colne and beyond the A4007.

5.87 The replacement building would be located behind the existing hotel and would be heavily screened by mature trees and vegetation. Due to the distance to these properties and intervening vegetation, there would be no adverse impacts in respect of loss of light, privacy or overshadowing.

5.88 Turning to noise, this application is accompanied by a Noise Impact Assessment, which assesses the noise emission from the new plant associated with the extension and the noise intrusion into the new bedrooms. This report concludes:

- In order for the proposed plant to achieve the required noise emission limits, it is recommended that reductions in operating duty are implemented for the condenser units serving the new guestrooms (to 70% during the daytime, and to 50% overnight).
- Provided that the proposed reductions are implemented correctly, noise emission from the proposed plant is expected to have a “low impact” on neighbouring properties.
- Plant noise intrusion into existing hotel guestrooms has been assessed, and is expected to meet the Premier Inn requirements without installing any specific attenuation measures.
- External noise intrusion into new hotel guestrooms has also been assessed, and indicative façade specifications expected to meet the Premier Inn requirements have been provided. These specifications are also expected to comply the London Borough of Hillingdon’s requirements, as the Premier Inn requirements are more onerous.

5.89 As such, the proposals would not have an unacceptable impact upon neighbouring residential properties, and the amenities of future occupants of the additional hotel rooms would be satisfactory, in accordance with Local Plan Policy EM8, London Plan Policy T7, and guidance within the NPPF.

Community Infrastructure Levy

- 5.90 The proposed development will be liable to pay the Community Infrastructure Levy. The existing restaurant is 'in use' for the purposes of calculating CIL. It was lawfully used as a restaurant for a minimum of 6 months in the previous 36.
- 5.91 The existing hotel and restaurant comprise 3,324sqm GIA of floorspace. The area of restaurant to be demolished is 757sqm. The proposed new extension is 2,416sqm. Therefore 1,659sqm of floorspace is liable to attract CIL.
- 5.92 Hillingdon CIL is calculated at £40 per sqm plus indexation for C1 hotel accommodation. Mayoral CIL is calculated at £60 per sqm plus indexation for C1 hotel use in Hillingdon.
- 5.93 It is anticipated that S106 Heads of Terms will be agreed with officers during the course of the application.

6 CONCLUSION

- 6.1 Premier Inn have identified this location as one where there is unmet demand for additional hotel accommodation. Planning permission is sought for demolition of the existing restaurant building and the construction of a new extension to the existing hotel to create a net increase of 70 bedrooms. The new extension will be constructed within the existing rear car park area, and a new replacement car park would be constructed in the area vacated by the current restaurant.
- 6.2 The extension would add additional bedrooms to a well-used hotel within the Riverside Way Estate and close to Uxbridge town centre, providing facilities for both travellers and visitors to the local area. The extension would create new jobs in both the construction and operations phases and support third party suppliers. The loss of the existing restaurant on site would be offset through the creation of a new hotel restaurant within the main hotel building to serve guests.
- 6.3 The extension will make more efficient use of the site and better utilise previously developed land in a sustainable location. The extension has been carefully designed to match the existing hotel in terms of height, scale, massing, appearance and materials to achieve a good quality result.
- 6.4 A detailed landscaping scheme has been submitted which would enhance the appearance of the site, and the proposals would deliver a significant Biodiversity Net Gain. A significant net increase in native tree planting and vegetation is proposed. It is considered these significant enhancements and benefits outweigh the development falling slightly short of the UGF target score of 0.3, and the absence of a living wall or green roof from the scheme.
- 6.5 The extension would not increase the risk of flooding to the hotel, or increase flood risk elsewhere. Appropriate surface water drainage provision has been incorporated into the proposals.
- 6.6 An appropriate amount of car parking would be retained for the enlarged hotel and the proposal would not impact on highway safety.
- 6.7 The building has been sustainably designed, and sustainable construction methods will be used when development is underway on site.

6.8 There are no elements of the proposal which are contrary to any adopted policy or guidance. On the contrary, the proposal is supported by numerous policies specifically in relation to new hotel bedrooms and the visitor economy, and making the most effective use of previously development land.

6.9 For all of the above reasons it is considered that the proposed development is in accordance with the policies of the London Borough of Hillingdon's Local Plan, the London Plan, and the National Planning Policy Framework, and it is respectfully requested that planning permission is granted.