

Premier Inn, 24 Uxbridge Road

in the London Borough of Ealing

planning application no. 193920OUT

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Outline planning application for alterations to the existing site access and driveway; rear ground floor extension to existing hotel restaurant (54 sq.m); and raised undercroft/entry foyer in front of the existing building with 15-storeys above comprising 14 floors of hotel accommodation providing 91 rooms with a further penthouse floor to be used either as a restaurant/bar or a further 6 hotel rooms (all matters reserved save for means of access and landscaping).

The applicant

The applicant is **Otaki Holdings Limited** and the architect is **MAA Architects**.

Strategic issues summary

Principle: The principle of development which intensifies the provision of tourist accommodation in the Ealing Metropolitan Town Centre is supported in accordance with Policy 4.5 of the London Plan and Policy E10 of the Intend to publish London Plan. (paragraphs 14-16).

Urban design and heritage: The layout, height and massing of the scheme are broadly supported in accordance with Policy 7.7 of the London Plan and Policy D8 of the Intend to Publish London Plan, subject to issues of design quality and facade treatment being addressed. The scheme would not result in harm to surrounding heritage assets or conservation areas. (paragraphs 17-28).

Sustainable Development: Further revisions and information are required, and the carbon dioxide savings verified before the energy proposals would be compliant with Policy 5.2 of the London Plan and Policy S12 of the Intend to Publish London Plan. (paragraphs 29-32).

Transport: Car parking should be reduced in line with Policy T6.1 of the Intend to Publish London Plan. End of journey cycle facilities are required and the design secured in accordance with London Cycle Design Standards. A road safety audit is required. Travel plans, delivery and servicing plans must be secured by condition. (paragraphs 33-39)

Recommendation

That Ealing Council be advised that the scheme does not currently comply with the London Plan for the reasons set out in paragraph 43 of this report, but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 29 November 2019, the Mayor of London received documents from Ealing Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 1C of the Schedule to the 2008 Order:

- *1C(c): "Development which comprises or includes the erection of a building, where the building is more than 30 metres high and is outside the City of London."*

3 Once Ealing Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 The site is situated in the Ealing Metropolitan Town Centre and is approximately 0.3 hectares in size. The site adjoins Uxbridge Road to the south, suburban 2-3 storey residential development to the north, and mixed commercial buildings in the order of 5-7 storeys in height with frontage to Uxbridge Road to the east and west.

6 The site is presently occupied by a Premier Inn Hotel building ranging 5 to 8 storeys in height. The existing hotel contains 165 beds, an ancillary restaurant/bar and 434 sq.m. of office floorspace (B1 use). Vehicle access to the site is currently achieved from Uxbridge Road, through a driveway on western side of the plot, to a rear carpark containing 39 car parking spaces.

7 Uxbridge Road which forms part of the Strategic Road Network (SRN) and is the main vehicular and pedestrian access to the site. The site benefits from a Public Transport Access Level (PTAL) of 6a, on a scale of 0-6b, where 6b is highest. Ealing Broadway station is 620 metres north-east of the site and served by London Underground (LU) District and Circle lines, TfL Rail and Great Western Railway (GWR) services. The site is well served by buses on Uxbridge Road.

Details of the proposal

8 The proposal seeks outline consent for the following development:

- A new raised undercroft/hotel entry at ground floor fronting Uxbridge Road.
- 15 storeys of new hotel accommodation situated above the new undercroft/hotel entry at ground floor, and providing:
 - an additional 91 hotel rooms on 14 floors

- a flexible 15th floor configuration to provide either a new hotel restaurant/bar or 6 further hotel rooms (determined at reserved matters stage)
- Relocation of the existing access driveway 6.5 metres to the west
- A ground floor extension of 54 sq.m to the existing hotel restaurant.

Case history

9 The scheme has not been subject to pre-application advice from GLA officers.

10 The present hotel occupying the site was approved in January 2009 (LPA ref: P/2008/3284) with the following description:

“Erection of part 5, 6 and 9 storey building with mezzanine floor and basement to form 165 bed hotel with ancillary restaurant/bar and 3,434sqm of B1 (a) date centre/office accommodation; alteration to western vehicular access and closure of eastern vehicular access; provision of 39 car parking spaces (including 14 disabled spaces); cycle parking, loading bay and associated landscaping”

Strategic planning issues and relevant policies and guidance

11 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Ealing Core Strategy 2012, Development Sites DPD 2013, Development Management DPD 2013, Joint West London Waste Plan 2015 and the London Plan 2016 (Consolidated with Alterations since 2011).

12 The following are also relevant material considerations:

- The National Planning Policy Framework;
- National Planning Practice Guidance; and
- The London Plan – intend to publish version (December 2019), which should be taken into account on the basis explained in the NPPF.

13 The relevant strategic issues and corresponding policies are as follows:

- Principle of development *London Plan;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Inclusive Design *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor’s Environment Strategy;*
- Transport London Plan *Mayor’s Transport Strategy;*

Principle of development

14 The application site is situated in the Ealing Metropolitan Town Centre, and is currently in existing use as a Hotel (C1 use) and Office (B1 Use). The scheme proposes the intensification of the existing hotel (C1 use) use of the site, through a building

extension providing an additional 91-97 hotel rooms and the expansion of hotel restaurant facilities.

15 Policy 4.5 of the London Plan and Policy E10 of the Intend to publish London Plan support the provision of high-quality serviced accommodation within town centre locations in outer London which are outside of the Central Activities Zone.

16 In the above policy context, the principle of intensifying hotel facilities on the site is supported.

Urban design and heritage

17 The design principles of chapter seven in the London Plan and chapter three of the draft London Plan outline that all developments should achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. In particular, Policy 7.5 of the London Plan and Policies D1 & D2 of the draft London Plan require architecture to make a positive contribution to a coherent public realm, streetscape and wider cityscape, incorporating the highest quality materials and design appropriate to the surrounding context.

Site layout

18 The scheme proposes a new 15 storey building addition situated in front of the existing hotel frontage facing Uxbridge Road. The situation of the new building is supported, with sufficient footway width remaining to ensure the active street frontage of the building is maintained.

Height and massing

19 The proposed height and massing of the 15 storey structure is broadly consistent with the existing streetscape in Uxbridge Road, which is generally characterised by commercial buildings ranging 6 – 23 storeys in height. On this basis the proposed height and massing of the building can be supported, subject to addressing the matters of design quality and heritage identified under the following headings.

Design quality

20 The shape and size of the front columns supporting the new hotel building above the undercroft risk enclosing the colonnade area, and the applicant is encouraged to refine this design treatment in order to reduce the dominance of these columns.

21 The flank elevations of the new building are substantially stark and prominent in views of the building along Uxbridge Road, and as a result the building would fail to respond positively to the existing character of the area. The applicant should incorporate options for articulating the flank elevations in a similar fashion to the street facing elevation, in order to improve the relationship of the building with the surrounding townscape.

22 In terms of facade treatments, the applicant has provided several options noting the scheme is in outline form. Of the options presented, the simpler gridded option is most successful. As above, the design treatment of the front facade should be carried around the four elevations of the new building in order to create a more unified and elegant building appearance whilst addressing concerns over the prominent blank flank elevations

of the building.

Heritage

23 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses, and for development in conservation areas "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."'. The NPPF states that when considering the impact of the proposal on the significance of the designated heritage asset, great weight should be given to the assets conservation. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting.

24 Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Policy HC1 'Heritage conservation and growth' of the Mayor's Intend to Publish London Plan, as well as London Plan Policy 7.8, state that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets. Case law outlines that a finding of harm to the setting of a listed building is a consideration to which the decision maker must give considerable importance and weight.

25 The application site contains no listed buildings and is not situated within a conservation area. Notwithstanding this, the site is situated approximately 120 metres west of the Grade II listed Ealing Town Hall, which is situated within the Ealing Town Centre Conservation Area. The site is also approximately 100 metres north of the Ealing Green Conservation Area, which contains a number of Grade II listed structures in the north-eastern corner of Walpole Park.

26 The applicant has provided a Townscape Visual Impact assessment which details the effect of the development on the surrounding townscape, including nearby heritage assets. Given the scale, massing and layout of the proposed development, the proposal would not result in harm to the surrounding heritage assets in regard to the tests outlined in the NPPF. As such the application accords with London Plan heritage policy and the NPPF.

Fire statement

27 In line with policy D12 of the Mayor's intend to publish London Plan, development proposals must achieve the highest standards of fire safety and ensure that they: are designed to incorporate appropriate features which reduce the risk to life in the event of a fire; are constructed in an appropriate way to minimise the risk of fire spread; provide suitable and convenient means of escape for all building users; adopt a robust strategy for evacuation which all building users can have confidence in and provide suitable access

and equipment for firefighting which is appropriate for the size and use of the development.

28 The applicant is required to submit a Fire Statement by a third party suitably qualified assessor. The statement should detail how the development proposal will function in terms of: the building's construction; the means of escape; access for fire service personnel and equipment, and the ongoing maintenance and monitoring of these how provision will be made within the site to enable fire appliances to gain access to the building. The Fire Statement should be submitted prior to determination.

Sustainable development

Energy

29 The energy hierarchy has been followed and the proposed energy strategy is broadly supported; however, further revisions and information are required before the proposals would comply with Policies 5.2 and 5.13 of the London Plan as well as Policies SI2 and SI13 of the Intend to Publish London Plan. Detailed comments have been forwarded to the LPA and the applicant under separate cover in this regard.

30 The carbon dioxide savings are proposed to meet the on-site target set within Policy 5.2 of the London Plan. The applicant should note that the zero carbon target specified in the Mayor's Intend to Publish London Plan will apply to non-domestic developments when the new London Plan is adopted, which must be met.

31 The applicant has identified the West Ealing district heating network within the vicinity of the development and should make contact with the developer and borough energy officer to investigate the progress with this and other local networks and the potential for connection. Evidence of the correspondence should be provided.

32 The applicant proposes to consider photovoltaics, solar water heating, heat pumps, biomass boilers and wind power for the development and suggests that it is assumed that PV will be incorporated onto the hotel roof. They have also proposed VRV ASHPs for the space heating and cooling. The applicant should provide a more detailed feasibility study considering the potential for renewable energy technologies and energy storage. As part of this they should consider how low carbon hot water can be provided, and they should consider heat pumps for this.

Transport

Healthy streets

33 The development is an extension to the front of the building and adds an undercroft footway which ensures the footway width remains similar to existing situation. The proposals include new landscaping which will improve the streetscape making it more attractive for new and existing users. It will provide places for people to stop and rest as well as shelter and shade which meets two of the Healthy street indicators in Policy T2 of the Intend to Publish London Plan.

Car parking

34 The site currently has 39 car parking spaces, 14 of which are designated spaces for

disabled persons. No new spaces are proposed as part of the development. This level of car parking is not in line with Policy T6.1 of the Intend to Publish London Plan, and the quantum of spaces overall is considered unnecessary. The applicant is encouraged to reduce the current number of spaces and provide parking for disabled persons only. A Parking Design and Management Plan should be secured by condition, with the aim to monitor and reduce car parking spaces. Electric vehicle charging points should be installed within the existing car park to meet London Plan intend to publish version Policy T6.

Cycle parking

35 A total of 27 cycle parking spaces are proposed which is in accordance Policy T5 of the Intend to Publish London Plan. End of journey shower and changing facilities should be provided for staff that travel to the site by sustainable modes. The cycle parking should be designed in accordance with London Cycle Design Standards (LCDS).

Access and Vision Zero

36 The site access is to be moved 6.5 metres further west on Uxbridge Road. The proposed junction layout swept path analysis and visibility splays should be developed in conjunction with Transport for London and Ealing Council Highways Officers. Adequate space and visibility should be provided for pedestrians, cyclists and vehicles in line with Mayor's Vision Zero agenda, ensuring safety is at the forefront of the development design. An independent Stage 1 Road Safety Audit should also be secured by provided.

Trip generation

37 The number of vehicle trips is unlikely to have a significant impact on the Strategic Road Network. Notwithstanding this, a guest travel management plan should be adopted to promote travel to the site by sustainable modes, and to confirm that additional public transport trips can be accommodated on the network.

Delivery, servicing and travel plans

38 Delivery and servicing will remain the same as the current site which is off-street and in accordance with Intend to Publish London Plan Policy T4. The quantum and frequency of servicing trips should be detailed in the Delivery and Servicing Plan which must be secured by condition, and submitted prior to determination.

39 A workplace Travel Plan and A Construction Logistics Plan must be secured by condition and approved by Ealing Council in consultation with TfL.

Local planning authority's position

40 Council Officer's from the London Borough of Ealing are broadly supportive of the proposal. The proposal is intended to be presented to Council Committee in February 2020.

Legal considerations

41 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies

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

Financial considerations

42 There are no financial considerations at this stage.

Conclusion

43 London Plan policies principle, urban design, sustainable development and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- **Principle:** The principle of development which intensifies the provision of tourist accommodation in the Ealing Metropolitan Town Centre is supported in accordance with Policy 4.5 of the London Plan and Policy E10 of the Intend to publish London Plan.
- **Urban design:** The layout, height and massing of the scheme are broadly supported in accordance with Policies 7.7 of the London Plan and D8 of the Intend to Publish London Plan, subject to issues of design quality and facade treatment being addressed. The scheme would not result in harm to surrounding heritage assets or conservation areas.
- **Sustainable Development:** Further revisions and information are required, and the carbon dioxide savings verified before the energy proposals can be considered compliant with Policy 5.2 of the London Plan and Policy SI2 of the Intend to Publish London Plan.
- **Transport:** Car parking across the site should be reduced in line with Policy T6.1 of the Mayor's Intend to Publish London Plan. End of journey cycle facilities should be provided, and the design of cycle parking secured in accordance with the London Cycle Design Standards. An independent road safety audit is required for access changes. Guest and workspace travel plans should be prepared and secured by condition, along with delivery and servicing plans.

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