
Sequential Assessment

ARIEL HOTEL, 118 BATH ROAD, HAYES, HEATHROW,
UB3 5AJ

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PREPARED FOR HEATHROW ARIEL OPCO
LIMITED

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1.0 INTRODUCTION

- 1.1 This Sequential Assessment supports a full planning application for the redevelopment and intensification of the Ariel Hotel at Heathrow. The proposals comprise a two-storey upwards extension to the existing hotel and erection of a new four storey apart hotel on land to the north within the existing site boundary, which would be operated as a combined airport focused offering and in conjunction with each other.
- 1.2 This assessment applies the sequential approach to an out-of-centre hotel proposal, considering suitability, availability and viability in line with the National Planning Policy Framework (NPPF) (2024) and Planning Practice Guidance (PPG).
- 1.3 The total development would deliver 398 hotel rooms consisting of 186 existing rooms, an additional 113 rooms to the existing hotel (additional 3,530 sqm) and 99 apart hotel studios within the new proposed apart hotel (additional 4,730 sqm) with supporting restaurant/bar, meeting facilities and associated access, servicing and parking.
- 1.4 The existing and proposed accommodation will continue to be managed by the existing hotel provider.
- 1.5 Notwithstanding, it is noted within the Council's pre-application written response from 05 April 2023 that the upwards extension would result in an uplift in hotel rooms which could *'reasonably be accommodated on a new site within or on the edge of a town centre location'*. However, it should be noted that the applicant's hotel provider intends to manage the site as a whole and as such, it does not appear that there are any sites within or on the edge of a town centre location that would be able to accommodate the requirements.
- 1.6 The London Borough of Hillingdon Officers confirmed that given the scale of intensification, increasing the total gross external area from 7,540 sqm to 15,800 sqm and that the site falls outside a defined town centre, the application site is therefore classified as an out-of-centre location for a main town centre use (hotel) proposal and that, in accordance with national and local policy, a Sequential Assessment is required to demonstrate that there are no sequentially preferable sites for a comparable development.
- 1.7 The methodology for the assessment has been set out in accordance with comments received from the Council's Planning Officers and Planning Policy Team and correlates with the approach accepted by the Council for comparable Heathrow hotels.
- 1.8 The assessment considers the policy context for this sequential assessment, followed by an explanation and definition of the catchment area, site identification, and an assessment of

potential alternative sites with respect to site suitability, availability, and viability.

2.0 POLICY CONTEXT

2.1 The relevant policy documents include the National Planning Policy Framework (NPPF) (2024), the London Plan (2021), Hillingdon Local Plan Part 1: Strategic Policies (2012) and Local Plan Part 2: Site Allocations and Designations (2020).

2.2 The application site is located within an 'out-of-centre' location and in accordance with Appendix 2 of the NPPF, a hotel is considered a main town centre use.

2.3 **Paragraphs 91 and 92** of the NPPF set out guidance on when sequential tests are required:

"91. Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

92. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored."

2.4 The NPPF refers to suitable alternative sites not being available. However, the Planning Practice Guidance expands upon this with **Paragraph 010** confirming that the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses.

2.5 Furthermore, **Paragraph 011** of the PPG advises that the application of the test will need to be proportionate and appropriate for the given proposal, with support from the Council if possible, and provides details of considerations to account for when determining whether a proposal complies with the sequential test:

- with due regard to the requirement to demonstrate flexibility, has the suitability of more central sites to accommodate the proposal been considered? Where the proposal would be located in an edge of centre or out of centre location, preference should be given to accessible sites that are well connected to the town centre. It is important to set out any associated reasoning clearly.
- is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.

- if there are no suitable sequentially preferable locations, the sequential test is passed.
- 2.6 A degree of flexibility should apply albeit flexibility in defining suitable sites should still relate to the developers proposal, which specifically includes the upwards extension of the existing hotel to provide an additional 113 hotel rooms, in addition to a new apart hotel building to provide 99 apart hotel studios within the site boundary which will utilise shared facilities such as Wi-Fi, vehicle circulation and car parking. This is the starting point for any sequential assessment of alternative sites.
- 2.7 **Paragraph 012** of the PPG states the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations, and robust justification will need to be provided where this is the case, with land ownership not providing such a justification.
- 2.8 In accordance with planning policy, the Sequential Test has been undertaken on the development proposal as a whole, encompassing both the hotel extension and the new apart hotel building, which would operate in conjunction with each other. However, the test appropriately focuses on the uplift element (212 rooms in total) rather than the existing 186-room hotel, which is already an established use on the site.
- 2.9 The principle of visitor accommodation is supported within the London Plan (2021) with **Policy E10** 'Visitor Infrastructure' confirming a sufficient supply and range of serviced accommodation should be maintained. The Policy further explains in outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 'Town Centres: Development Principles and Development Plan Documents') where they are well-connected by public transport, particularly to central London.
- 2.10 **Policy SD7** 'Town Centres: Development Principles and Development Plan Documents' promotes a town centre first approach, requiring an impact assessment on proposals for new, or extensions to existing, edge or out-of-centre development for retail, leisure and office uses.
- 2.11 In accordance with Figure 2.10 of the London Plan, the site does fall within the Heathrow Opportunity Area. However, a sequential approach should of course still be taken.
- 2.12 In accordance with local planning policy, **Policy DME 5** 'Hotels and Visitor Accommodation' of Local Plan Part 2: Site Allocations and Designations (2020), the Council will support a range of visitor accommodation, conference and related uses in accessible sustainable locations.
- 2.13 **Policy E2** of Hillingdon's Local Plan Part 1: Strategic Policies (2012) outlines that the Council will accommodate a minimum of 3,800 additional hotel bedrooms, and new hotels and visitor

facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations.

- 2.14 It is understood that the site was previously within an area allocated for Hotel Growth, however following the publication of the Government's Airports National Policy Statement (ANPS), locations identified on the Heathrow perimeter for Hotel Growth were removed as part of the examination of the Local Plan: Part 2 (2020), due to these sites occupying land that is identified for the expansion of Heathrow.

- 2.15 Notwithstanding, in early 2020 the LPP2 was adopted without the allocation, followed shortly afterwards by the Court of Appeal's decision to quash the Government's Airports National Policy Statement (ANPS), which had previously supported a third runway at Heathrow. As such, the site was previously considered suitable for a hotel use, and the reason for its removal - linked to anticipated airport expansion - no longer exists.

3.0 OPERATIONAL AND MARKET REQUIREMENTS

- 3.1 This section of the assessment provides key information on the criteria for a new four-star or similar hotel operator in the Heathrow Airport area, catering to the airport.
- 3.2 When selecting sites that are available, suitable and viable, in accordance with the PPG guidance, consideration of the operational and market requirements is required for the existing hotel operator (Best Western), driven by the demand for their 4-star hotel accommodation that is located in close proximity to Heathrow Airport.
- 3.3 For clarity, the existing hotel operates as a facility accommodating airport users, serving businesses, travellers, and airline crew who require easy access to the airport.
- 3.4 Heathrow handles over 80 million passengers annually, generating a continuous need for short stay accommodation serving flight schedules. Demand for such airport-focused hotels is not met by existing town-centre stock, which predominately targets longer-stays, and visitors for local attractions, events, shopping and business/work.
- 3.5 The scheme seeks to deliver an uplift of 113 hotel rooms (additional 3,530 sqm) by way of an upwards extension to the existing hotel and 99 apart hotel studios within the new proposed apart hotel (additional 4,730 sqm) with supporting restaurant/bar, meeting facilities and associated access, servicing and parking. The existing hotel contains 186 hotel rooms comprised over 7,540 sqm.
- 3.6 This document will demonstrate that suitable sites for an airport hotel are scarce, in consideration of the proposals limiting factors; specifically, the operational and locational requirements that shape whether an alternative site could reasonably deliver a comparable airport-oriented hotel scheme.
- 3.7 The Sequential Test will be proportionate and in consideration of the proposal, which is essentially a scheme for a hotel and ancillary services, offering an uplift of 212 rooms by way of an upwards extension and within a new building to operate in parallel and the existing hotel.
- 3.8 It is understood a degree of flexibility should be applied, a comparable scheme would be of a proposal for a four-star or similar 212 bedroom hotel near Heathrow Airport, with the projected market aimed at users of the Airport. The existing hotel operator, Best Western, is an internationally recognised operator and would provide a high quality hotel offering and the locational requirements would be like other airport hotel operators (requiring close proximity to the airport). It must be stressed that this would be a comparable scheme and not necessarily 'suitable' by virtue of the fact the proposal the subject of this document refers to expansion of

an existing facility with associated apart hotel, as opposed to a separate standalone 212 bedroom hotel.

- 3.9 The sequential site search seeks an appropriate site for a new 212 bedroom hotel with associated car parking within a town centre location. A reduced figure of 0.5 hectares (ha) will be taken as a flexible figure for the purposes of the sequential test. Regardless, it will be shown that this site area is difficult to provide in local centres, where identified sites are not suitable to meet the operational requirements for an airport hotel, specifically, by virtue of being too small. The operational and market requirements are detailed below:

Location

- Hotel operators will seek sites with excellent access to different modes of transport to facilitate time-efficient access to the airport. Therefore, the location needs to be highly accessible. Recommended locations would be off main roads. The site should ideally be within a 10-15 minute drive to Heathrow Terminals in order to enable ease of access to the target market. Ideally a 5 minute drive would be required, however, further degrees of flexibility are being applied.

Size

- The site area for the purpose of the assessment is 8,000 square metres (86,111 sq. feet / 0.8 ha), which would provide space for a 5 storey hotel and 4 storey apart hotel. Applying an initial degree of flexibility, and considering the limited car parking offer available within the current site, a minimum of 5,000 sqm (53,819 sq. feet / 0.5 ha) would be considered a reasonable base as part of the sequential site search.
- Any site would need to accommodate a hotel or hotel and apart hotel, consisting of 300-400 bedrooms, allowing for reduced room numbers while maintaining viability. This would typically be between 4-6 storeys; however, this would vary on the site area and planning constraints.

Parking

- The level of car parking would be subject to its location and therefore the site should be large enough to accommodate an appropriate level. The site should also have sufficient space and bays to facilitate the safe manoeuvre of vehicles for future occupant access and servicing, and provision of electric charging spaces and staff parking. Therefore, the amount of parking required ranges between 50 and 200 spaces.
- While the PPG encourages flexibility, and in central or highly accessible locations, a reduction in car parking provision to accommodate this could be considered. However, the airport-related function requires a higher level of parking to accommodate guest and staff travel to and from Heathrow. The proposed quantum is therefore considered appropriate and proportionate, representing the lowest practical provision that maintains operational functionality.

Facilities

- In addition to hotel bedrooms, the site should be able to accommodate facilities for the target market. This would include a restaurant, meeting rooms/conference rooms, as well as gym/spa facilities. These elements while ancillary, are integral to an airport hotel operation and function, crucial in providing a high-quality customer offering and day-to-day function expected of a 4-star facility.

- 3.10 Overall, the above would summarise the key operational and market requirements for any site, the most important requirement being proximity to Heathrow Airport Terminals, given anticipated users would be looking for short-stays and direct access to the airport.
- 3.11 We now turn to the methodology for identifying suitable alternative sites.

4.0 LOCATION AND SEARCH CRITERIA

4.1 The sequential test catchment area needs to satisfy key operational, locational, market, and policy requirements. Therefore, the requirement would be for a hotel to directly serve and be in close proximity to Heathrow Airport and its associated terminals.

4.2 As such, we have applied a 5 mile (approx. 15 minute drive) search radius from Heathrow Airport, locating the nearest centres surrounding the airport. As such the following areas have been considered in this assessment:

- Staines (Secondary Regional Centre, Spelthorne BC & Runnymede BC)
- Hounslow (Metropolitan Centre, LB Hounslow)
- Feltham (Major Centre, LB Hounslow)
- West Drayton (Town Centre, LB Hillingdon)
- Hayes (Town Centre, LB Hillingdon)
- Southall (Major Town Centre, LB Ealing)

4.3 While this assessment aligns with the Paragraph 91 of the NPPF, locating sites primarily in town centres and then the edge of such centres, it is noted that these locations, whilst having good access to public transport, do not necessarily conform to the operational and market requirements of the proposal.

4.4 The search site shortlisting exercise was guided by both:

- Planning Policy requirements: Priority was given to sites located within designated 'town centres' and 'edge-of-centre' locations; and
- Specific locational needs: Given the airport related nature of the scheme, the search was focused on centres in closest proximity to Heathrow airport, and on sites of sufficient scale to accommodate the proposed development.

4.5 The following criteria was followed in respect of site parameters and flexibility:

- A minimum site threshold of 0.5 ha was adopted, reflecting the scale of development required.
- A 5-mile (approx 15 minute drive) search radius from Heathrow Airport was applied, locating the nearest centres surrounding the airport. Public-transport travel times were also reviewed. However, variations in service frequency and reliability justified the exclusion of this parameter from the assessment.

- A 20% tolerance was applied to site size and locational parameters, to avoid excluding sites that fall marginally outside the thresholds.
- Sites likely to become available within up to five years were also reviewed, consistent with PPG guidance.

4.6 Given the limited availability of sites meeting all criteria, additional flexibility was applied where a site was close to meeting at least two of the key parameters, to ensure a thorough and proportionate review.

4.7 To remain flexible, the in-centre sites would remain, including a variety of sites with different plot sizes; acknowledging a smaller plot could be built higher to accommodate the required number of hotel rooms.

4.8 Please see below list of sources that were reviewed in searching for sites:

- Adopted and emerging site allocations in the Hillingdon Local Plan Part 2: Development Management Policies and Site Allocations & Designations (2020), together with relevant emerging allocations in the draft Local Plan Review.
- The London Borough of Hillingdon Brownfield Land Register (2020).
- The London Borough of Hillingdon “Land and Property for Sale” webpage, identifying surplus or disposals.
- Unimplemented planning permissions within Hillingdon that could represent available development opportunities.
- The open market, including searches through commercial agents and online platforms such as Rightmove Commercial, Estates Gazette, Vail Williams, Knight Frank, Savills, and 4Prop.

4.9 As set out in the next section, it was not possible to identify any suitable, available and viable sites within or on the edge of the centres that would be suitable for a large airport hotel.

5.0 SEQUENTIAL ASSESSMENT

- 5.1 The approach to site selection has been undertaken, demonstrating flexibility that complies with the requirements of the NPPF and PPG.
- 5.2 In line with the above guidance, the sites have been assessed in relation to their suitability, availability, and viability.
- 5.3 Where a site has been assessed as suitable to accommodate the proposal or a similar scheme (e.g. it is of sufficient size), it has then been assessed for its availability for development (e.g. it is not allocated for a different use and does not have an extant planning permission being built out). If a site is found to be either not suitable, not available, or both, then it was not necessary to assess the viability of the proposal.
- 5.4 In accordance with the above, the sites have been be scored on a positive (✓), negative (X), or unassessed (-).
- 5.5 A summary of the identified sites is in the table in **Appendix 1**, where a total of 14 sites were identified based on the search criteria as explained in this assessment. The table displays the site name, size, location, distance to Heathrow Airport terminals, source of where the site was found, followed with the sequential assessment for each site to see whether they were deemed suitable or available, then viable, and a concluding explanation.
- 5.6 Based on the results of the sequential assessment, an alternative site in a town centre or edge of centre location would not be realistic for the purposes of proposal.
- 5.7 As such, there are no sequentially preferable sites identified by the assessment, and it is considered the sequential test is therefore passed. The application site is the most suitable location for the expansion of the existing hotel and the newly proposed apart hotel building, and town centre/edge of centre locations would not be able to meet the locational (proximity to airport), operational (operated by Best Western) or physical (site area) requirements to be considered a suitable site as per the Sequential Assessment.

6.0 CONCLUSION

- 6.1 An extensive search was taken within the relevant catchment area for potential sites that could host the proposed development. It has been identified that no sites located within a town centre or edge of centre location would be suitable, available, and viable for the proposed hotel scheme, despite allowing for flexibility with the type and size of scheme.
- 6.2 When looking at the main market requirement for an airport hotel, the proximity to the airport was considered the main priority. The sequential approach required sites to be located within town centres or edge of centres, which are significantly further from the airport in comparison to the application site. With this in mind, and from analysing the sequential test, it has been demonstrated that there are no town centre or edge of centre locations that would be considered appropriate for the proposal, and by virtue of not being able to locate any suitable town centre or edge of centre sites, the sequential test is passed.
- 6.3 Degrees of flexibility have been incorporated by discussing the proposal as a singular scheme rather than a scheme for a hotel expansion with separate apart hotel use as per the application proposals. Furthermore, flexibility has been given in the total size of the proposal allowing for sites from as small as 0.5ha with additional flexibility provided.
- 6.4 A comprehensive review of sites within a 5-mile / 15-minute travel catchment has not identified any sites that are both suitable and available to accommodate a hotel of comparable format.
- 6.5 Furthermore, the majority of sites identified are committed to residential or mixed-use redevelopment, rendering them unsuitable in policy terms and unavailable in practice.
- 6.6 Consistent with Heathrow area precedents and having applied appropriate flexibility on format and scale, the proposed expansion of the Ariel Hotel, Bath Road therefore passes the Sequential Test in accordance with the National Planning Policy Framework (NPPF) (2024), the London Plan (2021), and Hillingdon Local Plan Part 1: Strategic Policies (2012) and Local Plan Part 2: Site Allocations and Designations (2020).

Appendix 1

Sequential Assessment Table

Site	Size (ha)	Area	Distance to Airport	Source	Suitable	Available	Viable	Conclusion
Thameside House, South Street, Staines, TW18	0.32	Staines	4 miles	Vail Williams	X	✓	-	Too small to accommodate the required scale
Land at Laurence Road Hounslow, London, TW3	0.13	Hounslow	5.6 miles	Savills	X	✓	-	Too small to accommodate the required scale
Hanworth Road, Feltham, TW13	0.15	Feltham	5.3 miles	4 Prop	X	✓	-	Too small to accommodate the required scale
Nestlé Factory / Land to the South of Railway, Botwell	12.2	Hayes	3 miles	Brownfield Register / Site allocations	X	X	-	Hillingdon LPP2 Site Allocation 5 Committed and allocated for housing-led re-development, excludes hotels LPA ref: 1331/APP/2017/1883
Former Nestlé Land (South of Railway), Botwell	1.5	Hayes	3 miles	Brownfield Register / Site allocations	X	X	-	Hillingdon LPP2 Site Allocation 5 Committed and allocated for housing-led re-development, excludes hotels LPA ref: 73238/APP/2018/1145
Chailey Industrial Estate, Pump Lane, Townfield	1.82	Hayes	3.5 miles	Brownfield Register / Site allocations	X	X	-	Hillingdon LPP2 Site Allocation 22 Committed and allocated for housing-led re-development, excludes hotels LPA ref: 2102/APP/2018/4231

Sequential Assessment Table contd.

Site	Size (ha)	Area	Distance to Airport	Source	Suitable	Available	Viable	Conclusion
The Old Vinyl Factory & Gatefold Buildings, Botwell	0.9	Hayes	3.5 miles	Brownfield Register / Site allocations	X	X	-	Hillingdon LPP2 Site Allocation 2 Committed and allocated for commercial/residential, excludes hotels LPA ref: 59872/APP/2016/3454
HPH 3, Hyde Park Hayes, Millington Road, Pinkwell	0.66	Hayes	2.9 miles	Brownfield Register	✓	X	-	Prior approval consent secured for conversion to residential use. LPA ref: 67702/APP/2018/920
Former Allotments, Burns Close, Barnhill	1.35	Hayes	3.5 miles	Brownfield Register / Site allocations	X	X	-	Hillingdon LPP2 Site Allocation 12 Committed for residential development, not including hotels LPA ref: 68069/APP/2019/22
Silverdale Road, Hayes	1.39	Hayes	3.6 miles	Brownfield Register / Site allocations	X	X	-	Hillingdon LPP2 Site Allocation 23 Committed and allocated for housing- led re-development, excludes hotels LPA ref: 71374/APP/2016/4027