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SEQUENTIAL ASSESSMENT

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1. INTRODUCTION

- 1.1 This note has been prepared by DP9 Ltd on behalf of Pelicans Manufacturing ('the Applicant') to support pre-application discussions regarding the proposals for a mixed-use development at 27 Uxbridge Road ('the Application Site'), which is located within the London Borough of Hillingdon ('LBH'). This note should be read alongside the Hotel Needs Assessment Study prepared by CBRE.
- 1.2 The Application Site is currently occupied by a hotel comprising of 173 rooms, several meeting rooms and a gym. The proposals include introducing approximately 1,318sqm GEA of incubator floorspace alongside expanding the hotel to provide an uplift of 262 rooms, resulting in a hotel with 435 rooms. The uplift in hotel rooms is proposed to serve the local business community, largely generated by the businesses located within the adjacent industrial estate and the proposed employment use. The proposed hotel will target the upscale market and be occupied by an independent hotel operator.

2. SEQUENTIAL TEST METHODOLOGY

- 2.1. During a pre-application meeting held with LBH officers on 1st March 2022, it was noted that the Application Site is not located within a designated town centre or in accordance with the Local Plan. Hotels are considered to be a main town centre use and a sequential assessment has therefore been requested in order to demonstrate that a sequentially preferable site is not available to accommodate the proposal, in line with Paragraph 87 of the National Planning Policy Framework and Policy DMTC 1 of the Local Plan Part 2 (2020).
- 2.2. In line with common practice, when carrying out the sequential site assessment a proportionate approach is required. While hotels are technically a 'town centre' use, a flexible approach is appropriate in this case. The definition of town centre boundaries is less clear cut in the dense urban context of London, and other highly accessible locations may be appropriate. Furthermore, in the wider policy context which seeks to support visitor accommodation and where there is demand for additional hotel accommodation serving different market sectors and needs, it should not be assumed that the opportunity to accommodate hotel accommodation in nearby designated centres and in other suitable highly accessible sites are mutually exclusive options. The accompanying Hotel Needs Assessment Study confirms that local hotels are outperforming the overall London market and that the limited existing offer, particularly in terms of upscale hotels, leaves an unmet demand in the Hayes area.

Criteria

- 2.3. The Planning Practice Guidance provides detailed advice relating to undertaking sequential assessments. Promoters of development for main town centre uses in out of centre or edge of centre locations must demonstrate why potential sequentially preferable sites are not practical in terms of their availability, suitability and viability:

- Availability – whether sites are available now or are likely to become available for development within a reasonable period of time. This includes considering whether there are any current or proposed developments for the site.
 - Suitability – with due regard to the need to demonstrate flexibility, whether sites are suitable to accommodate the need or demand which the proposal is intended to meet, including consideration of any planning designations.
 - Viability – whether there is a reasonable prospect that development will occur on a site at a particular point in time. A minimum of 262 hotel rooms is considered to be the threshold for a deliverable hotel scheme by the Applicant.
- 2.4. Notwithstanding the above, the NPPF requires applicants to demonstrate flexibility on issues such as format and scale.
- 2.5. The Supreme Court Judgement in the Dundee case is a key consideration in assessing the sequential approach to site selection. The judgement confirms that the sequential approach must be applied for use in the ‘real world’ not some artificial world. The question is: “whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site”. The judgement confirms that the issue of suitability is directed to the developer’s proposals and not some alternative scheme which might be suggested by the Local Planning Authority.
- 2.6. The Rushden Lakes decision (Appeal Reference APP/G2815/V/12/2190175) also clarifies that there is no longer a requirement to disaggregate proposals across more than one site (which is reiterated in the NPPG). The decision is also of relevance in terms of when a site is considered ‘available’ in the context of the sequential test (please refer to Appendix 1 for a copy of this decision).

- 2.7. Further to the above, the Judgment in Aldergate (2016) established that *“‘suitable’ and ‘available’ generally mean suitable and available for the broad type of development which is proposed in the application by approximate size, type and range of goods”*. There is nothing in Aldergate which detracts from the proposition that it is the ‘developers’ proposal’, subject to appropriate flexibility, that is to be assessed. Thus, it is *“not some other proposal which the planning authority might seek to substitute for it which is for something less than sought by the developer”*.
- 2.8. The above case law has informed the methodology we have applied to the sequential test for the current application. It would not be appropriate to assess the uplift in hotel rooms only as this would in effect consider the provision of two smaller hotels. The qualitative need on the application site is for a larger hotel with an increase and improvement of facilities within the hotel to meet the demands of adjacent businesses. Such facilities could not be provided by two smaller and locationally separated hotels.
- 2.9. Further to this, disaggregating the hotel and incubator elements of the proposal would lead to viability issues, as the uplift in hotel rooms is required to support the provision of the incubator space. The introduction of incubator space on this site is also a primary factor in driving the need for the uplift in hotel rooms. Therefore, assessing just the uplift in hotel rooms as suggested would mean assessing an undeliverable scheme.
- 2.10. On this basis, the extended hotel and incubator space must be able to be delivered on a single suitable, available and viable site.
- 2.11. Notwithstanding the case law on disaggregation, this sequential assessment has also had regard to whether each site could accommodate the uplift in hotel rooms only. This is not required by case law but we have considered whether a site could accommodate a 262-room hotel for robustness.

Site Selection

- 2.12. The Application Site is located adjacent to an industrial estate comprising of a wide range of businesses. The existing hotel primarily serves the local business community, and its operation is based on a symbiotic relationship with this community. The proposed uplift in hotel rooms will continue to serve visitors to these businesses, in line with the hotel operator's model, and the expanded hotel will continue to be an integral part of the mix of uses in this location.
- 2.13. Therefore, the need for the proposal is site-specific and the location in which this need could be addressed is limited in scope. The target catchment area for the hotel operator is within, or in close proximity to, the Application Site. Notwithstanding this, a sequential assessment has been undertaken in respect of appropriate sequentially preferable locations outside the target catchment of the hotel operator for robustness.
- 2.14. Following a meeting with LBH's policy officers, an appropriate area of search was defined. It was considered that centres within a 30-minute journey time on public transport would be appropriate, which includes three centres that are located within the London Borough of Ealing ('LBE'). This approach was agreed with officers. A plan of these centres can be found at Appendix 1.
- 2.15. The Local Plan Part 1 (2012) sets out at Policy E2 that new hotel and visitor facilities will be encouraged in Uxbridge, Hayes, the Heathrow perimeter 'and in other sustainable locations'. Policy SEA 2 of the Local Plan Part 2 seeks to promote and protect a network of locations for hotel growth across LBH, which comprise Uxbridge Town Centre, Stockley Park LSEL and Hayes Town Centre. Policy DME 5 of the Local Plan Part 2 states that LBH will support visitor accommodation in the locations defined in Policy SEA 2. The site selection process has considered these hotel growth locations and other relevant centres in line with the 'town centre first' approach. This has included designated town centres that lie within the area of search in LBE.

- 2.16. Consideration was had to any emerging Local Plan documents within LBH and LBE. However, Hillingdon Local Plan Part 2, which contains the detailed development management policies and site allocations for the borough was only recently adopted in 2020. LBE are in very early discussions for a new Local Plan but there are not yet any published draft policies and a call for sites has not yet been undertaken. Therefore, the site allocations within both boroughs are considered to be up to date.
- 2.17. The relevant locations within LBH and LBE have undergone investigation to identify any potential sequentially preferable sites. Site allocations within or on the edge of the relevant town centres were identified through the Hillingdon Local Plan Part 2 (2020) and the Ealing Local Plan Development Sites DPD (2013). In addition, we have searched the estate search websites Savills, Rightmove and Zoopla for any relevant brownfield land or town centre sites suitable for redevelopment currently for sale within the relevant town centres.
- 2.18. Finally, we have considered planning permissions for hotels in the catchment area identified by CBRE in their Needs Assessment. The majority are located in out of centre locations and have therefore not been assessed. Those that are within in-centre or edge-of-centre locations fall within site allocations and have therefore been assessed as part of those allocations.
- 2.19. The resulting list of sites to be assessed has been prepared in accordance with advice received from LBH. Therefore, the scope of the assessment is considered to be appropriate for the proposed development and meets the requirements of the sequential test.

3. SEQUENTIAL SITE ASSESSMENT

- 3.1. The following centres and sites have been assessed to identify potential sequential sites, and evaluate their availability, suitability and viability. Detailed assessment of each site allocation, as well as further details of each site, can be found within Appendix 2.

Hayes Town Centre – Site Allocations

- 3.2. There are a large number of site allocations within or on the edge of Hayes Town Centre within LBH. A significant proportion of these are allocated for residential development and have therefore not been assessed in further detail. They are not considered to be suitable locations for employment and leisure development because the loss of residential land to commercial development would undermine the Council's housing targets. A site must be suitable for it to be considered a sequentially preferable site and therefore further assessment was not considered necessary.

Eastern End of Blyth Road, Hayes

- 3.3. The Local Plan identifies a 1.1ha site known as Eastern End of Blyth Road, Hayes for development under Policy SA 3. It located immediately to the north west of Hayes & Harlington railway station and is split into three sub-sites: Site A, Site B and Site C.
- 3.4. In there have been a number of residential-led schemes approved on the Eastern End of Blyth Road, Hayes site, in accordance with the allocation SA 3. These schemes are either under construction or have been built out. The majority of the site is covered by these permissions and is therefore not considered to be available. The remainder of the site is not large enough to accommodate the proposed development without some level of disaggregation of the proposal. It would also be too small to accommodate 262 new hotel rooms, which is considered to be the minimum viable number of

rooms that could be provided by the proposed development. Therefore, the site is not considered to be a viable option for the applicant.

Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes

- 3.5. Policy SA 5 of the Local Plan identifies a large 16ha site to the south of the railway lines for redevelopment. However, only a small portion of the site falls within the Hayes Town Centre boundary. Therefore, the remainder is considered to be edge of centre.
- 3.6. The site previously housed the Nestle coffee manufacturing plant, which closed in 2012. It has since been identified as the most significant growth point within the Hayes Housing Zone and the Council are keen that its redevelopment is fully integrated in order to deliver the associated infrastructure requirements. The allocation splits the site into three sub-sites – Site A, Site B and Site C – which have each been assessed.
- 3.7. The site-wide allocation requires that its redevelopment is delivered through coordinated regeneration with community infrastructure delivered alongside residential and employment (including B1, B2 and B8 uses). Therefore, it is not considered that piecemeal development of the site, for example through our client's proposed scheme, would be appropriate in this location. However, even if a site were to become available on any of the three sub-sites, the accompanying Hotel Needs Assessment Study confirms that local hotels are outperforming the overall London market and that the limited existing offer, particularly in terms of upscale hotels, leaves scope for more than one new hotel in the area. The delivery of a hotel on this site and the Application Site are therefore not mutually exclusive options.
- 3.8. Notwithstanding the above, it is not considered that this location would be suitable for the proposed development without disaggregation, as this would undermine the Council's target for delivery of new homes on the site. A disaggregated scheme cannot be required in accordance with case law and would render the scheme unviable.

Hayes Town Centre – Other Available Sites

- 3.9. A search of commercial properties, brownfield land and development opportunities on Savills, Rightmove and Zoopla did not yield any appropriate sites for the proposed development. The largest property on the market is the former Blue Anchor Public House on Printing House Lane, which is an edge-of-centre location. The site is listed for sale on Rightmove and has planning permission for a four-storey 1,444sqm office building of B1 use. It is therefore too small to accommodate the proposed development and does not permit a hotel use.

Uxbridge Road, Hayes Minor Retail Centre

- 3.10. The Hillingdon Local Plan, estate search sites and recent planning permission data did not identify any site allocations within or on the edge of Uxbridge Road, Hayes Minor Retail Centre, so we have not assessed any sites within that location.

Hillingdon Heath Local Centre

- 3.11. No potential sequentially preferable sites were identified by site allocations in Hillingdon Local Plan, planning permission data or estate search websites. Therefore, there were no sites within or on the edge of Hillingdon Heath Local Centre that needed to have undergone sequential assessment.

Willow Tree Lane Local Centre

- 3.12. We have not identified any appropriate sites within or on the edge of Willow Tree Lane Local Centre for sequential assessment. We understand there are no appropriate site allocations, no recent planning permissions for hotels and no suitable sites currently on the market.

Southall Major Centre – Site Allocations

- 3.13. We assessed eight site allocations in edge-of-centre and in-centre locations identified for development through the Ealing Local Plan Development Sites DPD. These sites are considered to be within a reasonable journey time of under 30 minutes via public transport from the Application Site.
- 3.14. The allocations include several large-scale regeneration sites, which are currently under development associated with planning permissions for masterplan schemes, including Southall Gasworks and Middlesex Business Centre. Whilst the planning permissions on these two sites include hotel provision, they would not be able to accommodate the minimum number of 262 hotel rooms required for the proposed development to be viable. The Hotel Needs Assessment Study recognises that there is demand for additional hotel facilities in the area arising from its proximity to Heathrow Airport. Therefore, the two consented hotels and the Application Site are not mutually exclusive options, and the development of the Application Site would not prejudice the consented hotels coming forward.
- 3.15. Southall Crossrail Station is also targeted for regeneration, but it is understood that this site is not on the market and is unlikely to be available within a reasonable timeframe. These three sites are being developed through coordinated regeneration and piecemeal development is considered to be inappropriate for the delivery of these sites.
- 3.16. A number of other allocations are currently occupied and with safeguarded uses. Beaconsfield Road/South Road is occupied by a number of educational and community uses, with extant planning permissions on the remainder. Iceland, Quality Foods and 63-95 South Road is currently occupied by a number of small retail and commercial units and coordinating land ownership would be challenging and not achievable within a reasonable timeframe. Southall Market is occupied by a listed building, a Lidl supermarket and a number of smaller commercial units. It has a number of extant and implemented

planning permissions on the site and would not be able to accommodate the proposed development. Finally, The Green allocation is occupied by a number of industrial uses also subject to a designation as a Locally Significant Industrial Site (LSIS) and is therefore not considered to be a suitable location for a hotel.

- 3.17. The remaining site allocation, Johnson Street, is allocated for low-density residential development and the retention of small businesses. Development of the proposals on this site would therefore undermine the Council's aspirations for the site and their housing targets.
- 3.18. In conclusion, whilst there are several large-scale site allocations within and on the edge of Southall Major Centre, with some suitable for a hotel use, there is limited scope for these sites to accommodate a development of a 435-room hotel with incubator space. Even if the scheme were to be disaggregated, they could not provide the minimum 262 rooms that are required for the scheme to be viable. Most importantly, none of the site allocations currently have any land for sale on the open market and are therefore not available.

Southall Major Centre – Other Available Sites

- 3.19. A search of commercial properties, brownfield land and development opportunities on Savills, Rightmove and Zoopla identified a number of commercial units for sale within the town centre. However, none are large enough to accommodate the proposed development or a minimum of 262 hotel rooms. The property at 5 The Broadway is currently the largest on the market within the town centre but has less than 1000sqm of floorspace spread across four floors and basement, comprising of retail and residential uses. Similarly, the property at 61 The Green is the largest edge of centre property on the market but comprises approximately 100sqm commercial floorspace at ground with three stories of residential uses above. Both sites are therefore too small to deliver the proposed development.

Greenford District Centre

- 3.20. Estate search sites did not uncover any available properties for sale within or on the edge of Greenford District Centre. However, two in-centre sites have been allocated for development in the Ealing Local Plan, which we have undergone sequential assessment. These are Ravenor Park Farm and Greenford Crossroads.
- 3.21. Both sites are relatively small at under 1ha and have existing properties located on them, which their respective allocations require to be retained. Ravenor Park Farm is being developed under planning permission for a children and adults services and the remainder of the site is occupied by a museum building that must be retained. Therefore, it is not considered to be available for development of the proposals. The Greenford Crossroads allocation is for retail and commercial units at ground with residential uses above and is therefore not suitable for the proposed large-scale hotel proposals. The complex land ownership position would also mean that the site is likely to prevent the proposed development from being delivered within a reasonable timeframe.

Hanwell District Centre

- 3.22. A search of commercial properties, brownfield land and development opportunities did not yield any sites for sequential assessment within or on the edge of Hanwell District Centre. Through the Ealing Local Plan Development Plan DPD, three site allocations were identified for assessment: 144-164 Uxbridge Road and 1-3 Westminster Terrace, the Wickes site, and 64-88 Uxbridge Road.
- 3.23. Two of the site allocations do not support the provision of hotel uses. The site of the former Wickes is allocated for additional retail and residential development and planning permission has been granted to deliver the redevelopment of the site accordingly. The 144-164 Uxbridge Road and 1-3 Westminster Terrace site is allocated for residential and business uses. Half of the site is currently occupied by industrial uses and the other half is subject to

an extant planning permission for residential apartments. Therefore, these two sites are not considered to be suitable or available for the proposed development.

- 3.24. The final site, 64-88 Uxbridge Road, is small at just 0.15ha and would therefore not be able to accommodate the proposed development or the minimum 262 rooms required for the scheme to be viable. It also has planning permission for flexible commercial space and residential units and is not considered to be available.

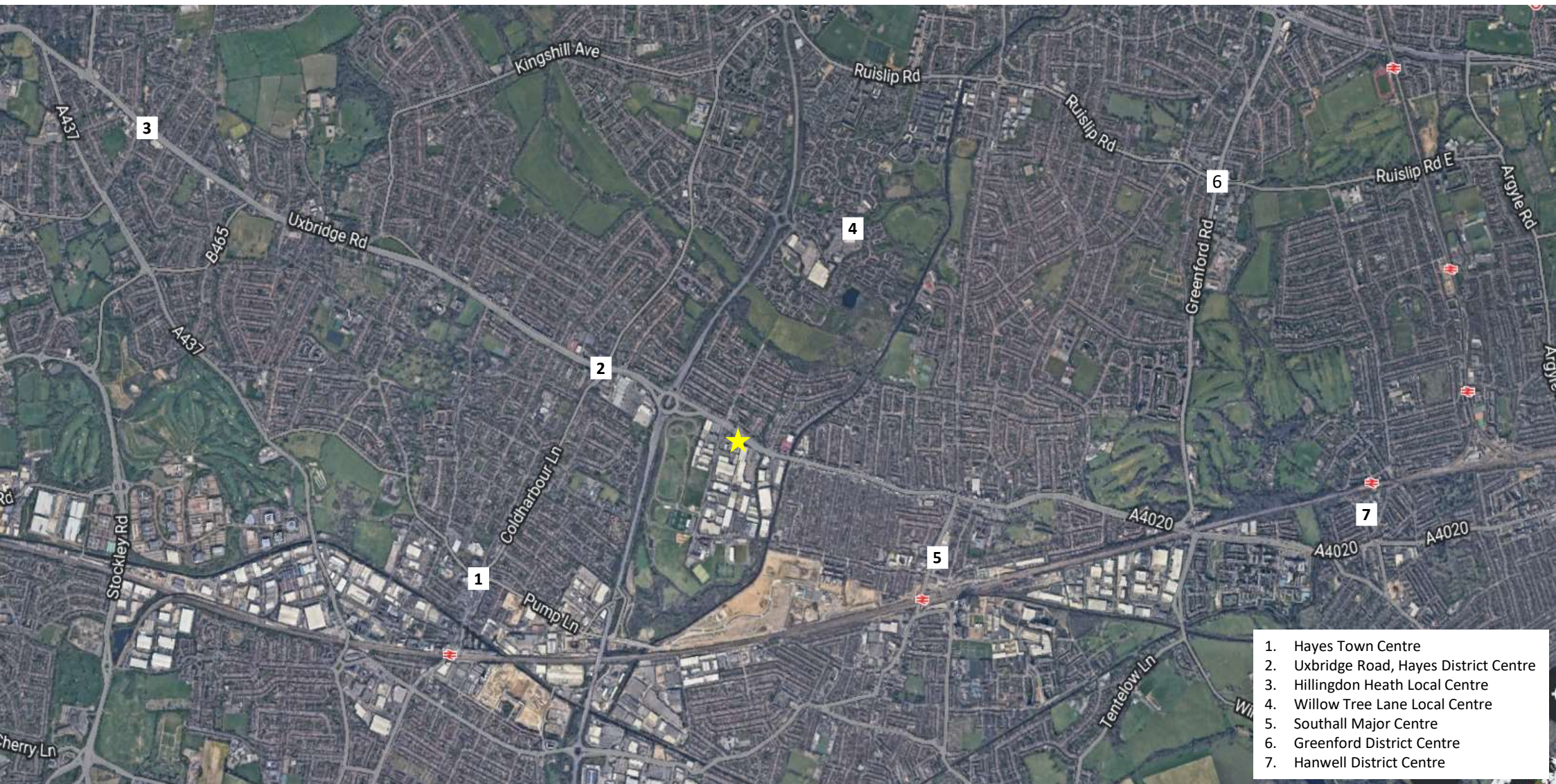
4. CONCLUSIONS

- 4.1. The proposed development includes a hotel of 435 rooms (involving an uplift of 262 rooms) alongside a range of hotel amenities and approximately 1,318sqm of industrial incubator floorspace. The Application Site is not located within a designated town centre or in another location in accordance with the Local Plan. Therefore, a sequential assessment has been undertaken to understand whether there are any sequentially preferable sites available to accommodate the proposed hotel.
- 4.2. The need for the proposed hotel arises from a symbiotic relationship with the proposed industrial floorspace. There is also an existing need for a hotel with better amenities arising from the surrounding businesses. The accompanying Hotel Needs Assessment Study confirms that the demand for these facilities would be met by a larger-scale hotel on the Application Site. Whilst the need for the hotel is site-specific, we have considered site allocations, planning permissions for hotels and development sites on the market within the seven retail centres that are well-connected to the Application Site by a journey of 30-minute or less using public transport. Through this, we identified 19 site allocations. There are no recent planning permissions for hotels within or on the edge of these retail centres, except for those located within site allocations, which have been assessed as part of those allocations. We identified a number of properties for sale within the seven town centres, but none were large enough for the proposed development.
- 4.3. As discussed above and in further detail within Appendix 2, none of the site allocations identified are considered to be suitable, available and viable for the proposed development, even when taking into account disaggregation, which cannot be required in accordance with case law. Even if a site were to become available within one of these site allocations, or on another town centre site, the available site and the Application Site would not be mutually exclusive options for hotel development. The Hotel Needs Assessment Study recognises that there is also demand for additional hotel facilities in the area arising from

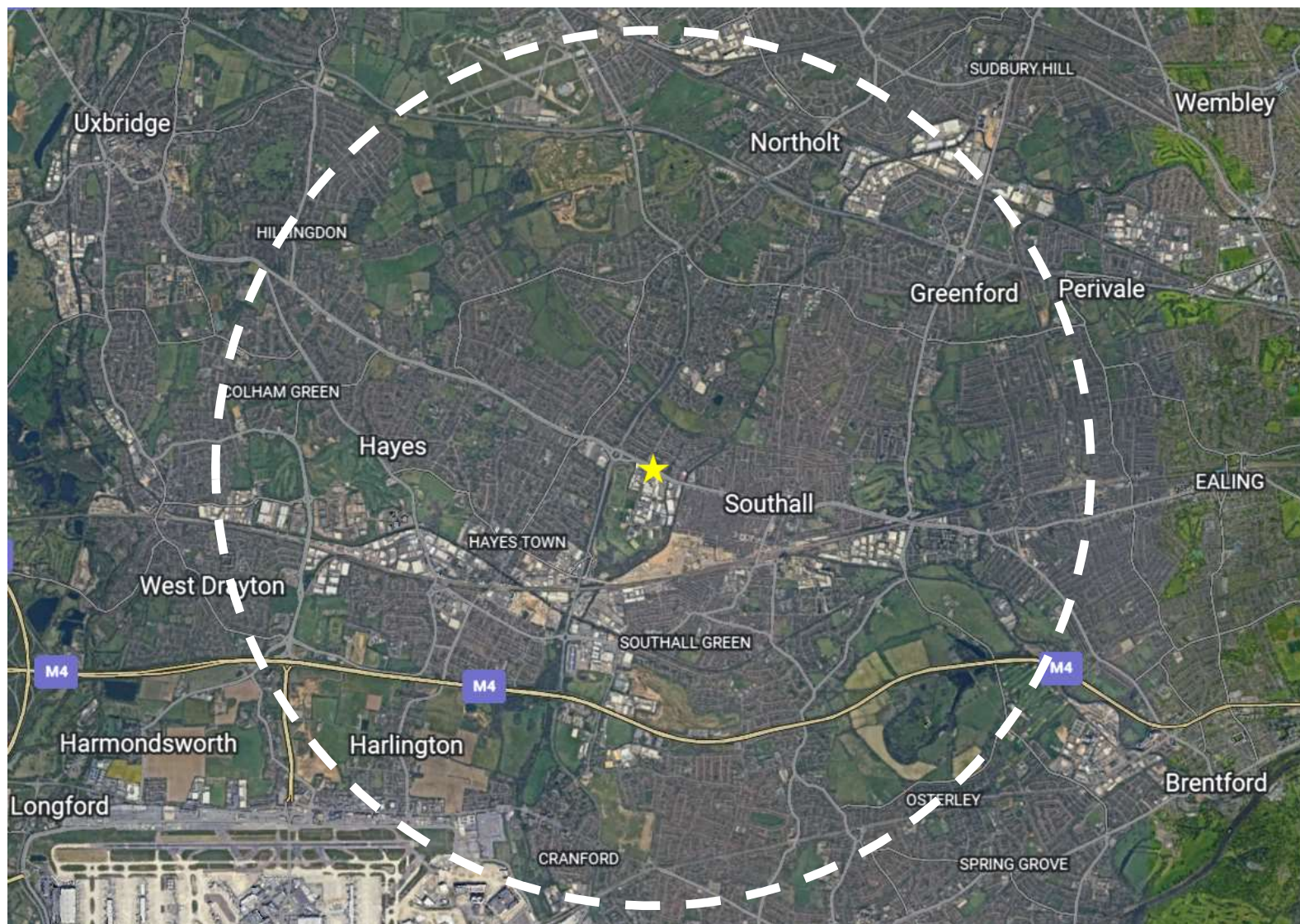
its proximity to Heathrow Airport and this additional demand could be met by further hotel development in the area, including within nearby retail centres.

- 4.4. The proposed development has been designed to meet a site-specific demand, primarily generated by the existing adjacent businesses and the proposed industrial floorspace within the scheme. Therefore, the most sustainable location choice for the proposed development is the proposal site, rather than a town centre. Notwithstanding this, the assessment of appropriate sequentially preferable sites has concluded that there are no sites located within a nearby retail centre or other appropriate location that are suitable, available and viable for the proposed development. Therefore, the sequential test has been passed.

Appendix 1 – Plan of Town Centres within 30 Minute Journey via Public Transport



1. Hayes Town Centre
2. Uxbridge Road, Hayes District Centre
3. Hillingdon Heath Local Centre
4. Willow Tree Lane Local Centre
5. Southall Major Centre
6. Greenford District Centre
7. Hanwell District Centre



Appendix 2 – Sequential Assessment of Allocated Sites

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
Hayes Town Centre							
1.	Eastern End of Blyth Road, Hayes – Site A	In centre	1.1 total	SA 3 (LBH)	Policy SA 3 allocates Site A for the delivery of planning permission reference 1425/APP/2011/3040, which was granted in 2013 and permitted 120 residential units and 600sqm of business space. Therefore, Site A is not suitable for the delivery of a hotel-led proposal.	Planning permission 1425/APP/2011/3040 in respect of Site A is under construction and is therefore no longer available.	Site A is under construction and therefore could not deliver the proposed development.
2.	Eastern End of Blyth Road, Hayes – Site B	In centre	1.1 total	SA 3 (LBH)	A portion of Site B is allocated for the delivery of prior approval reference 3151/APP/2014/3777, which allowed the change of use from office to create 60 residential units. The remainder of the site is allocated for mixed-use development. However, the prior approval covers the majority of Site B and it is not considered that the proposed development comprising over 400 hotel rooms alongside business space could be accommodated on Site B without being disaggregated.	It is understood that Site B has been built out and is therefore also not available.	Site B has planning permissions that cover the majority of site area. The remaining area available on this site is not considered to be sufficient to accommodate a development of 435 hotel rooms and 1,220sqm of floorspace. Disaggregation of the scheme could undermine the viability of the proposal and case law confirms that this should not be required. Even if the scheme was disaggregated, the site could not accommodate a hotel with a minimum of 262 hotel rooms.
3.	Eastern End of Blyth Road, Hayes – Site C	In centre	1.1 total	SA 3 (LBH)	This site is allocated for residential-led mixed-use development that will contribute to the regeneration of the town centre. It is identified in the Hillingdon Housing Trajectory for the provision of 120 residential units. Therefore, any development proposal for Site C will be expected to deliver	Planning permission 68974/APP/2018/2146 on Site C is also under construction. Therefore, Eastern End of Blyth Road, Hayes is not considered to be available for the proposed development.	Site C has planning permissions that cover the majority of site area. The remaining area available on this site is not considered to be sufficient to accommodate a development of 262 hotel rooms.

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
					<p>this number of residential units as a minimum.</p> <p>Planning permission reference 68974/APP/2018/2146 was granted in 2019 for 188 units, office space and retail units with community amenity space and child play space. Whilst this permission did not cover the entirety of the site, Site C is only 0.3ha in total and, therefore, it is not considered that the proposed development could be delivered on Site C alongside the permission without being disaggregated.</p>		
4.	Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes – Site A	Edge of centre	16 total	SA 5 (LBH)	<p>Policy SA 5 allocates this site for the provision of 1,000 new homes, B8 and small-scale commercial uses, and community infrastructure including health, community and recreation facilities. On this basis, Site A could be suitable for the proposed development. However, planning permission reference 1331/APP/2017/1883 was granted in 2017 for a scheme comprising 1,386 new homes alongside office, retail, community and leisure uses and a substantial quantum of commercial floorspace. The permitted uses do not include any hotel use. Therefore, it is not considered that Site A is suitable for the proposed development.</p>	The masterplan proposals permitted under planning permission reference 1331/APP/2017/1883 are currently under construction and therefore the site is not considered to be available to accommodate the proposed development.	There is currently a scheme under construction on this site that does not include a hotel use. Therefore, the proposed development could not be delivered on this site.
5.	Land to the South of the Railway,	Edge of centre	16 total	SA 5 (LBH)	<p>This site is allocated for the provision of 300 residential units and supporting community infrastructure,</p>	Planning permission reference 51175/APP/2020/2543 does not cover the entirety of Site B and	Part of this site has already received planning permission for 103 homes. The remaining area is expected to

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
	including Nestle Site, Nestle Avenue, Hayes – Site B				including education. Therefore, the allocation does not support the proposed hotel and business development. Planning permission reference 51175/APP/2020/2543 was approved for part of the site comprising of 103 residential units. Even if a hotel use was considered suitable on this site, the delivery of the proposed development would place constraints on delivering the remaining 197 homes and education uses on Site B.	therefore the site could become available for development within a reasonable time frame.	deliver a minimum of 197 homes and an education use, and it is unlikely that the proposed development could be delivered alongside these uses without disaggregation.
6.	Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes – Site C	Edge of centre	16 total	SA 5 (LBH)	Allocation SA 5 identifies Site C for the provision of 500 residential units and southern access to Hayes & Harlington station. Planning permission reference 73238/APP/2018/1145 was granted in 2019 and permitted 457 new homes, A1 retail units, A3 café units and over 2,000sqm of office floorspace on part of the site. The permitted uses do not include hotel use so Site C is not considered suitable for the proposed development. The remaining 0.53ha of the site could be considered suitable for the proposed development. However, it is expected that this would deliver the remaining 43 residential units within the allocation, and it would therefore be difficult to deliver the proposed development on this site without disaggregation.	The site allocation acknowledges that this site falls under multiple land ownerships, which could cause issues for the timescale of delivery. It is unlikely that this issue could be overcome and the sale	As with Site B, the remaining site area is not expected to be able to deliver the proposed development as well as the allocated 43 homes without disaggregation.

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
Southall Major Centre							
7.	Southall West (also known as Southall Gasworks)	In centre	37.2	SOU5 (LBE)	This site is allocated for comprehensive residential-led mixed use development. Planning permission (ref. P/2008/3981) was granted by the GLA in 2016 for 3,750 new homes on the site alongside a range of commercial uses, including a 9,650sqm hotel and 3,000sqm of conference and banqueting space. However, it is understood that this would accommodate a hotel of up to 250 rooms, which is not large enough to meet the minimum number of rooms (262) required for the proposed development. In any event, the proposed 435-bed hotel and incubator should not be required to be disaggregated in line with case law.	The site has undergone significant remediation works and is being redeveloped through coordinated regeneration by Berkeley Homes. It is understood that there is a complex legal position regarding the contamination of the site and that Ealing are seeking ongoing legal advice. In addition, the site is not currently on the market and could therefore not be acquired and developed by the applicant within a reasonable timeframe.	The complex remediation works on site linked to its history as a former gasworks has led to a complex legal arrangement between the London Borough of Ealing and the current developer and it is therefore not considered that piecemeal development, for example through the delivery of the proposed development on the site, would be a viable option.
8.	Beaconsfield Road/South Road	In centre	3.23	SOU3 (LBE)	This site is allocated for continued education and community uses with the introduction of some complimentary retail, business and residential uses. The allocation does not accommodate hotel uses, although a hotel could be argued to be a complimentary use suitable for the town centre.	A series of planning permissions have been granted on the site for an inclusive teaching centre (ref. P/2012/4739), retail and business uses (ref. PP/2012/5267), 118 residential uses (ref. 203705FUL) and a mixed-use residential and retail scheme (ref. PP/2015/4921). It is therefore not considered that the site is available to accommodate the proposed development because the majority of the site is either fully developed or has recent planning permission for residential uses.	The site is not considered to be a viable option for the proposed development because it does not have an available area large enough to accommodate a 435-bed hotel alongside the supporting incubator space and it would not be appropriate to disaggregate the proposals. Notwithstanding the legal issues with disaggregation, the site would also not be able to accommodate a 262-bed hotel.
9.	Iceland, Quality	In centre	1.23	SOU2 (LBE)	The allocation on this site is for mixed-use development comprising a	The site is not currently for sale and is understood that the existing units	Due to the reasons above, acquiring ownership of this site is not

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
	Foods and 63-95 South Road				<p>range of retail and commercial unit sizes appropriate to a variety of occupier requirements. It is clear that the spirit of this allocation is to provide a mixed and varied development with predominantly retail and family-friendly leisure uses to enliven the high street and improve the retail offering. Therefore, it is not considered that a large-scale hotel would be appropriate for this site.</p> <p>Notwithstanding the above, the allocation confirms that some increase in massing on the site would be considered acceptable, but this must pay careful consideration to the adjacent residential and educational uses. The site could not accommodate the minimum 262 hotel rooms on upper floors whilst maintaining an acceptable height on the site. Therefore, this site is not suitable for the proposed development.</p>	on the site are under multiple ownerships. Therefore, the complexity of the land ownership of this site presents a serious challenge to coordinating its comprehensive redevelopment and it is not considered that this could be worked through within a reasonable timeframe.	achievable within a reasonable timeframe and the site could not accommodate the minimum uplift in hotel rooms. Therefore, this site is not viable for the delivery of the proposed development.
10.	Southall Crossrail Station	In centre	4.79	SOU4 (LBE)	The allocation on this site is for a comprehensive redevelopment to provide a mixed of uses including town centre uses and community, employment and residential uses. Therefore, a hotel and incubator space scheme could be suitable development on this site. However, due to the Council's aspirations for comprehensive redevelopment, it is	It is understood that the site is not currently for sale and is therefore not available for the delivery of the proposed development.	This site is not currently available and it is therefore not considered to be viable as it would not be able to deliver the proposed development within a reasonable timeframe. Even if a site were to become available, the accompanying Hotel Needs Assessment Study confirms that local hotels are outperforming the overall London market and that the

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
					not considered that piecemeal development of this site through the delivery of the proposed development would be appropriate, as it could undermine the Council's key objectives of integration, improved environmental quality and the redevelopment of the Gurdwara.		limited existing offer, particularly in terms of upscale hotels, leaves scope for more than one new hotel in the area. The delivery of a hotel on this site and the Application Site are therefore not mutually exclusive options.
11.	Southall Market, 44-96 High Street	In centre	1.49	SOU1 (LBE)	The site is allocated for mixed use development to include the refurbishment of the existing listed building, provision of a street market, a variety of commercial units with active frontages and additional street parking. A number of planning permissions have been approved for the site, including ref. 200471FUL granted on the site in 2020 to provide 125 residential units with car park and it is understood that this application has been implemented. A further application (ref. 192888FUL) was approved in March 2021 for 149 residential units with ground floor commercial units. Another application is pending for the redevelopment of the buildings along the high street frontage (ref. 214644FUL). The remainder of the site would not be able to provide a large enough hotel, taking into account the need for other uses on this site.	This site is not currently on the market and there is an existing and operational Lidl supermarket and several planning permissions on the site. Therefore, this site is not available.	The site could not accommodate the proposals without disaggregation, which case law confirms cannot be required. Notwithstanding that point, it is also unlikely that a minimum of 262 hotel beds could be provided on the site as well as the consented development and the uses required in the allocation.
12.	Johnson Street	Edge of centre	2.89	SOU10 (LBE)	This site is allocated for residential and employment uses and is therefore not considered to be	The site is currently occupied by a range of small businesses. The allocation supports the retention of	A minimum viable number of 262 hotel rooms could not be accommodated on this site, taking

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
					suitable for the development of a large upscale hotel.	these businesses with the addition of low-density family accommodation. Therefore, it is not considered that this site is available for the development of a large hotel.	into account the need for residential development.
13.	The Green, Featherstone Road, Dominion Road	Edge of centre	8.30	SOU8 (LBE)	This site is allocated for continued industrial uses in line with its designation as a Locally Significant Industrial Site (LSIS), with commercial and retail units providing active frontages along The Green. As the land is predominantly safeguarded for industrial uses, it would not be suitable for the proposed hotel development.	The site is not currently on the market and is occupied by a number of industrial uses. It is therefore not considered to be available and is unlikely to become available in the near future as the industrial uses are safeguarded as part of the allocation.	The site could not accommodate a large-scale hotel development and is therefore unviable.
14.	Southall East (also known as Middlesex Business Centre)	Edge of centre	9.21	SOU6 (LBE)	Outline planning permission (ref. 183673OUT) was granted in November 2019 for the redevelopment of the site, which included outline approval for a 7,199sqm hotel alongside over 2000 residential units, retail and employment uses. Reserved matters have not yet been applied for and the application expires in November 2022. Therefore, a hotel and employment development would be suitable on this site.	It is understood that the site is not on the market and is therefore not currently available. The planning permission on the site requires reserved matters approval, which must be applied for before November 2022 in order to secure the delivery of a hotel and employment space on this site. In addition, the permission is phased and is being delivered through coordinated regeneration. It is therefore unlikely that the proposed development could be delivered on the site within a reasonable timeframe, should it become available on the market.	It is understood that the hotel would provide approximately 180 rooms, which would not be sufficient for the proposed development of a 435-bed hotel. Even if the proposed development was disaggregated, the uplift of 262 hotel rooms could not be delivered on the site and is therefore not a viable option.
Greenford District Centre							
15.	Ravenor Park Farm,	In centre	0.66	GRE1 (LBE)	The site is allocated for mixed use development appropriate to the town	The northern half of the site is subject to an implemented planning	In the event the live planning application were to be unsuccessful

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	Oldfield Lane South				centre with the retention of the existing museum and heritage centre on site. It could therefore be suitable for a hotel.	permission (ref. P/2013/1486) for a children and adult services centre. A further planning application has recently been submitted for the southern half of the site, seeking approval for change of use of the existing buildings on site to music & film studios, community space and offices. Therefore, it is not considered to be available.	the remainder of the site is not large enough to accommodate the proposed development whilst respecting an appropriate heights for this site and it is therefore unviable.
16.	Greenford Crossroads, 311-319 Ruislip Road East and 412-424 Greenford Road	In centre	0.30	GRE2 (LBH)	This site is allocated for mixed used development including retail, office and residential uses, with a variety of commercial active frontages at ground and residential above. The properties at 311-317 Ruislip Road East should be retained. Therefore, this site is not suitable for a large-scale hotel and incubator space development.	The site is not currently on the open market and is therefore not available. The site is currently occupied and falls under and number of ownerships, with several small-scale planning applications having been submitted in recent years. Therefore, obtaining ownership of the whole site would require a lengthy and challenging acquisition process and we do therefore not consider this site could become available within a reasonable timeframe.	Due to the need for retaining the two-storey 311-317 Ruislip Road East properties, the site could not accommodate a large-scale hotel and commercial development. Even if the scheme were to be disaggregated, the minimum viable number of rooms could not be accommodated on this site.
Hanwell District Centre							
17.	144-164 Uxbridge Road and 1-3 Westminster Terrace	In centre	0.48	HAN2 (LBE)	This allocation is for residential and business uses. The site is therefore not suitable for the proposed hotel-led development.	The site is not currently on the market and is therefore not available. The eastern half of the site is subject to planning permission (ref. 164632FUL) for retail space, 36 apartments and 7 houses. The western portion of the site is occupied by commercial premises in line with the site allocation and the site is therefore not likely to be able to deliver the	The eastern portion of the site is being developed and the western portion of the site is occupied. Notwithstanding that occupation, the western half of the site is not large enough to accommodate the proposed hotel and business development without an unacceptable height. It would also not be large enough for the

	Site Name/ Address	Policy Location	Size (ha)	Policy Allocation	Suitability	Availability	Viability
						proposed development within a reasonable timeframe.	minimum 262 hotel rooms and is therefore unviable.
18.	Wickes, 83-101 Boston Road	In centre	0.84	HAN3 (LBE)	This allocation is to improve and extend the existing retail offering on site, alongside the introduction of residential. The site is therefore unsuitable for a hotel and incubator space.	Planning permission (ref. 191309FUL) was granted on the site in 2020 for 333 residential apartments with ground floor retail, leisure and commercial units. The site is also not currently on the market and is therefore not available.	The site is not appropriate for hotel or incubator development and is therefore not a viable option.
19.	64-88 Uxbridge Road	In centre	0.15	HAN1 (LBE)	This site is allocated for town centre and community uses. It could therefore be suitable for a hotel.	Planning permission (ref. 172913FUL) was granted at appeal in 2018 for flexible retail, commercial and leisure uses with 59 residential units. Therefore, the site is not available.	The site is subject to an extant planning permission and in any event would be too small to accommodate even the minimum number of hotel rooms.