



Sequential Test



Client Name: Toyoko Inn., Co Ltd

Site Address: Capital Place, 120 Bath Road,
Heathrow, UB3 5AN

Date: December 2025



Document control

Document Version Control

Revision No.	Project Stage (if applicable)	Prepared by	Approved by	Date Issued



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SECTION 1

Introduction



1.0 Introduction

- 1.1.1 This Sequential Test has been prepared in support of the emerging planning in relation to the redevelopment of the site at Capital Place, 120 Bath Road, Heathrow, UB3 5AN (the site). The site has not had a formal rent paying tenant for several years. It is being occupied for administrative and office functions by Toyoko Inn., Co Ltd in accordance with the lawful planning use. This Sequential Test has been prepared on behalf of Toyoko Inn., Co Ltd and submitted to the London Borough of Hillingdon (the Council).
- 1.1.2 The emerging proposals seek to convert the existing office premises (Class E) into a hotel (Class C1), incorporating extensions that will provide a 206 bed hotel, measuring 6,528 sqm (GIA). As outlined in our pre-application letter, while the site benefits from excellent connectivity to Heathrow Airport and is situated in a sustainable location, it is positioned outside a designated town centre and beyond the Heathrow perimeter. Consequently, in accordance with Policy DMTC 1 of the Hillingdon Local Plan and London Plan SD7, which advocates a town centre-first approach, a Sequential Test is required. Notably, this requirement has also been applied to other hotel developments within the vicinity.
- 1.1.3 This report has been prepared in accordance with the requirements of the National Planning Policy Framework (NPPF, December 2024) by applying a Sequential Test. This report demonstrates that the site is sequentially preferable because of material considerations that justify its redevelopment. While the existing office use is classified as a main town centre use, we consider that there is no policy objection to the site's proposed change from office use to hotel use. This report has been updated to respond to the comments made from officers regarding the approach to the sequential test made during the pre-application process.
- 1.1.4 We have used recent Sequential Tests in the area to inform the search parameters.



SECTION 2

Site and Surrounding Area



2.0 Site and Surrounding Area

2.1.1 The site is located at 120 Bath Road and is situated at the intersection of Bath Road and High Street Harlington. It comprises a part three and four-storey former office building constructed of brick, alongside an associated car park. The property is classified under Class E of the Use Classes Order 1987 (as amended) and provides 5,888 sqm of floor space. The total site area measures approximately 1 hectare.

2.1.2 The surrounding area is predominantly commercial in nature, characterised by a variety of business and hotel developments. Heathrow Airport lies directly to the south, across the A4, while residential properties are located to the north. A number of hotel uses are situated nearby, and the Sheraton Skyline Hotel is located directly to the west. Notably, the site does not feature any statutory or locally listed buildings.

2.1.3 Public transport accessibility is relatively good, with the site benefiting from a Public Transport Accessibility Level (PTAL) rating of 4. The site is not located in an area at risk from flooding.

2.1.4 As mentioned, a number of hotel schemes are nearby where the Sequential Test has been undertaken and found acceptable by the Council. This includes:

- 242 Bath Road, UB3 5BJ
- 118 Bath Road, UB3 4AJ

2.1.5 With regard to these assessments the following was agreed. We have therefore adopted these parameters within this Sequential Test.

- The search catchment area is limited to towns within a 20-minute travel time by public transport.
- Travel time is measured as an approximate from the public transport terminus at Terminals 2 and 3.
- Allocated sites in the Local Plan, as well as recent planning permissions within the 20-minute travel time, have been considered.
- A rationale has been provided for the inclusion or exclusion of each site.
- Sites within the London Borough of Hounslow, Ealing and Hillingdon are considered. However, towns outside of the 20-minute catchment area are excluded, as they are not reasonable suitable to serve Heathrow Airport.



SECTION 3

Policy Background



3.0 Policy Background

3.1.1 The development plan for the site includes the following:

- The London Plan (adopted March 2021);
- The Hillingdon Local Plan Part 1: Strategic Policies (adopted November 2012);
- The Hillingdon Local Plan Part 2: Development Management Policies, Site Allocations and Designations (adopted January 2020).

3.1.2 The site is not located within a Neighbourhood Plan Area, nor are there any emerging Neighbourhood Plans.

3.1.3 The National Planning Policy Framework (NPPF) (December 2024) is a material consideration. In addition, the Development Framework is supported by a number of Supplementary Planning Documents (SPDs) and Planning Briefs.

3.1.4 Hillingdon Borough Council is currently reviewing all Local Plan documents. As part of this process, the Council conducted a Call for Sites consultation from 26 May 2023 to 29 September 2023, followed by a Call for Views consultation in June 2024. According to the Local Development Scheme (LDS) (2025), the new Local Plan, including Site Allocations, is expected to be adopted between June and July 2027. However, the emerging Plan has not yet reached a stage where it can be considered a material factor in decision-making.

3.1.5 The LDS notes that the Council has received numerous site submissions and is in the process of reviewing and assessing them. Additionally, the Call for Sites will be reopened as part of the Regulation 18 consultation. As a result, the Council currently does not have a finalised list of new potential sites for review as sequentially preferable. In light of this, we have examined the currently allocated sites within approximately a 20-minute travel time by public transport. Notably, this approach was deemed acceptable in the Sequential Test for a nearby site

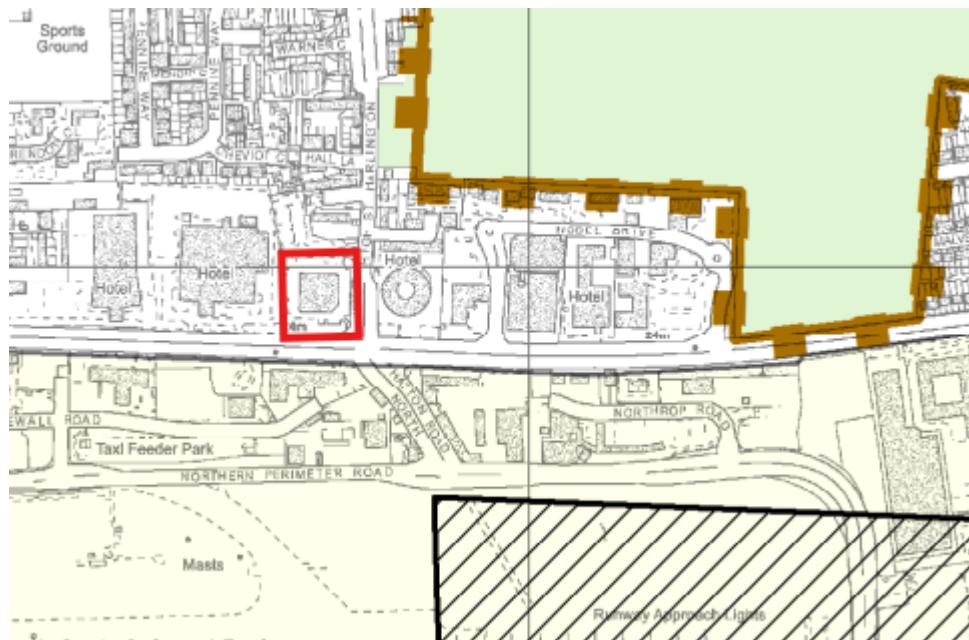
3.1.6 To note, as per the requirement of other Sequential Tests found acceptable within the Borough, we have also reviewed allocated sites in the London Borough of Hillingdon and Hounslow, as per accepted methodology elsewhere.

3.2 Designations

3.2.1 By way of background, below is an extract from the Council's Proposals Map (just the red line around the building is shown in red. Please note the full application red line includes the car park to the north).



3.2.2



3.2.3 The adopted Local Plan proposals map identifies the following:

- Within 'white land' on the Proposals. There are no specific Local Plan land use designations applicable to the site. However, the site does fall within the Heathrow Opportunity Area – albeit the boundary of this is not defined by the London Plan);
- Within an Air Quality Management Area;
- Within an Archaeological Priority Area;
- Near to the Green Belt Boundary Area (indicated in green – to the north east);
- The site as sitting outside of the Heathrow Boundary Area (indicated in yellow – to the south);
- Outside of a designated town centre;
- PTAL of 4 (not shown on the Proposals Map).
- Outside area at risk from flooding

3.3 Relevant Policy

3.3.1 The following provides an overview of the relevant policy in this case. As the site is located outside of a town centre, and within the Heathrow Opportunity Area. The following policies applies.

3.3.2 London Plan Policy SD6 Town centres and high streets confirms that the vitality and viability of town centres should be promoted and enhanced. This can be achieved by encouraging a range of uses that meet the needs of Londoners including main town centre uses.

3.3.3 London Plan Policy SD7 Town centres outlines a requirement for a 'town centre first approach' and discouraging out-of-centre development. A sequential test should be applied to applications for main town centre uses requiring them to be located in town centres followed by edge of centre sites where no in centre sites are available or likely to become available within a reasonable period of time.



3.3.4 Policy DMTC 1 of the Development Management Policy Document states that the Council will support 'main town centre uses' where development proposal is consistent with the scale and function of the centre. Part c) states that proposals for main town centre uses in out of centre locations will only be permitted where there is no harm to residential amenity. Part i) states that the Council expects proposals for main town centre uses to demonstrate that there are no available or suitable sites in a town centre where an edge of centre or out of centre location is proposed, using a sequential approach.

3.3.5 The NPPF (Annex 2) defines a main town centre use as follows:

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

3.3.6 The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking. (Paragraph 009 ID: 2b-009-20190722).

3.3.7 Paragraph 011 ID: 2b-001-20190722 advises that the Applicant should demonstrate compliance and its application should be proportionate and appropriate for a given proposal. Flexibility should be applied to a proposal with a consideration given to the contribution made by developing in more central locations. Sites should be assessed as to whether they are likely to become available within a reasonable period of time based on the scale and complexity of a particular scheme.

3.3.8 Paragraph 012 ID: 2b-012-20190722 also states that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which means that they can only be accommodated in certain locations. This is particularly of relevance for a hotel scheme seeking to serve Heathrow operations.

3.4 Methodology

3.4.1 As noted, our approach aligns with established precedents within the Borough for other hotel schemes near the site. The assessment focuses on sites within a 20-minute public transport radius. Locations outside this catchment area are considered unsuitable for meeting the operational requirements of Heathrow Airport. It should be noted that this approach has been accepted in the Sequential Test for hotel scheme at Axis House on Bath Road, there should be no reason why this shouldn't continue to be accepted for the subject site. The site's proximity to the Heathrow Airport market is a key factor in determining its viability and suitability for hotel development within this sector. We have reviewed the following centres:

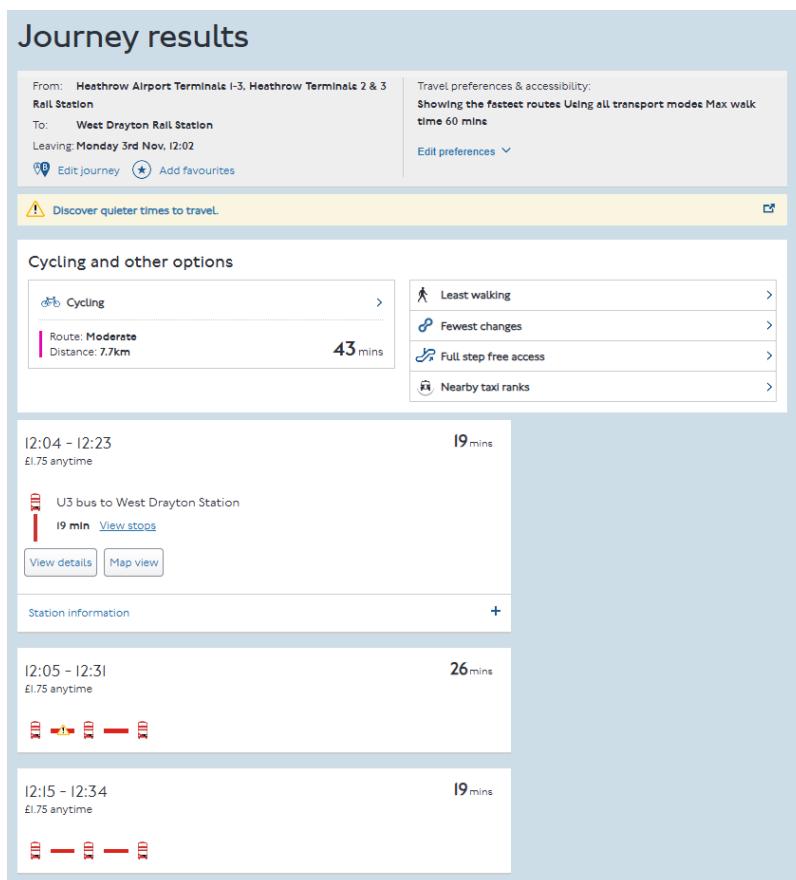


- West Drayton – LB Hillingdon
- Hayes Town Centre – LB Hillingdon
- Hounslow West – LB Hounslow
- Southall – LB Ealing.

Area of Search

3.4.2 Following pre-application advice on this Sequential Test, officers requested that we confirm whether the centres above aligns with the 20-minute public transport radius, and requested a map to illustrate the transport radius. However, to illustrate this more accurately we have used the TfL journey planner which shows the results of the public transport travel times. We provide extracts below:

Terminal 2&3 to West Drayton



Terminal 2&3 to Hayes & Harlington Station



Journey results

From: Heathrow Airport Terminal 1-3, Heathrow Terminals 2 & 3 Rail Station
To: Hayes & Harlington Rail Station
Leaving: Monday 3rd Nov, 12:10
[Edit journey](#) [Add favourites](#)

Travel preferences & accessibility:
Showing the fastest routes Using all transport modes Max walk time 60 mins
[Edit preferences](#)

[Discover quieter times to travel.](#)

Cycling and other options

Cycling	>
Route: Moderate Distance: 7.1km	40 mins
Walking	>
Walking speed: Moderate Distance: 8.1km	1 hrs 52 mins

Bus only	>
Least walking	>
Fewest changes	>
Full step free access	>
Nearby taxi ranks	>

12:14 - 12:23
£1.75 anytime

9 mins

SL9 Superloop bus to Hayes & Harlington Station
9 min [View stops](#)

[View details](#) [Map view](#)

12:15 - 12:29
£7.30 off peak

14 mins

.....

12:19 - 12:34
£7.30 off peak

15 mins

.....



Terminal 2&3 to Hounslow West

Journey results

From: Heathrow Airport Terminals 1-3, Heathrow Terminals 2 & 3 Rail Station
To: Hounslow West Underground Station
Leaving: Monday 3rd Nov, 12:12
[Edit journey](#) [Add favourites](#)

Travel preferences & accessibility:
Showing the fastest routes Using all transport modes Max walk time 60 mins
[Edit preferences](#)

Discover quieter times to travel.

Cycling and other options

Cycling	Bus only
Route: Moderate Distance: 7.8km	43 mins
Walking	Least walking
Walking speed: Moderate Distance: 7.8km	1 hrs 37 mins
	Fewest changes
	Full step free access
	Nearby taxi ranks

12:17 - 12:31 **14 mins**
E210 off peak

Transfer to Heathrow Terminals 2 & 3 Underground Station
4 min [View directions](#)

Piccadilly Line to Hounslow West

Part Suspended [View stops](#)

Walk to Hounslow West Station
3 min [View directions](#)

Hounslow West Station

[View details](#) [Map view](#)

12:23 - 12:37 **14 mins**
E210 off peak

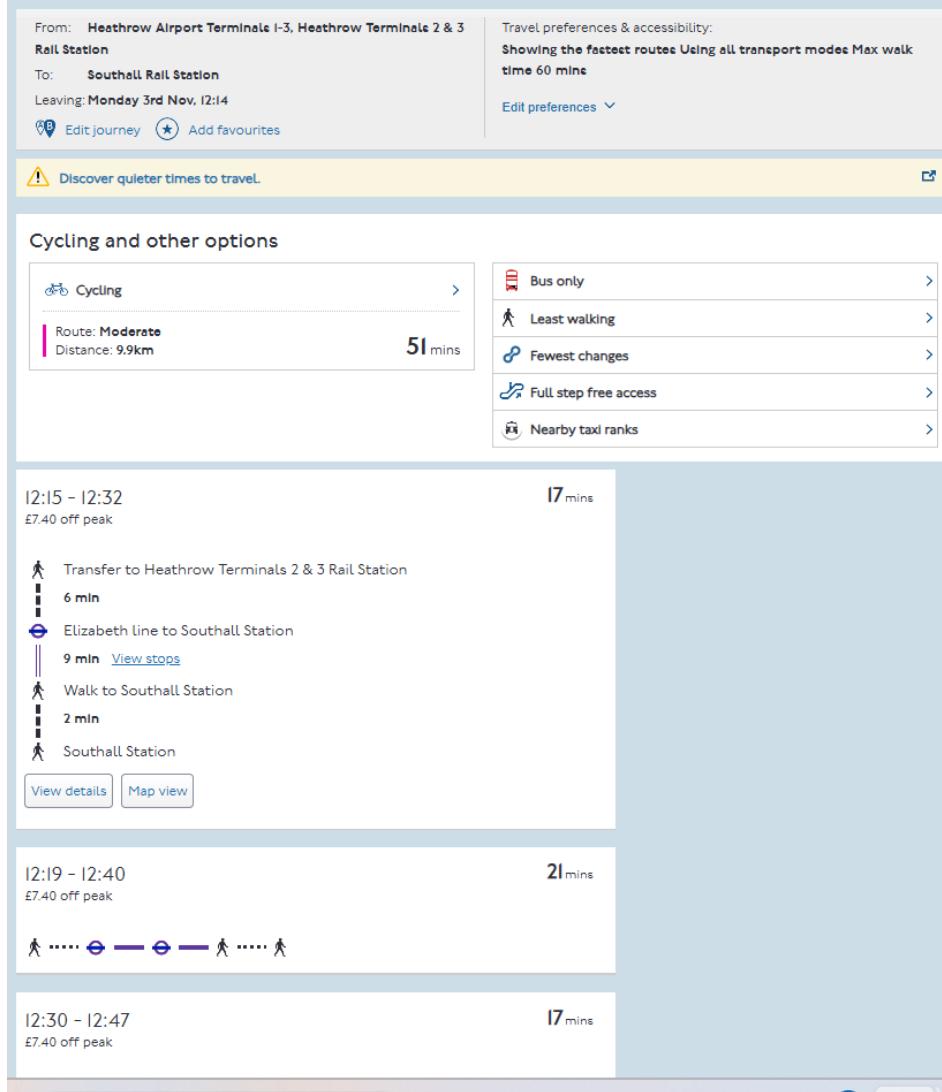
12:19 - 12:42 **23 mins**

12:29 - 12:43 **14 mins**
E210 off peak



Terminal 2&3 to Southall Station

Journey results



3.4.3 As outlined above, the four centres are generally located within a 20-minute public transport travel radius and are therefore considered suitable for review. However, this assessment is based on the assumption that an average individual can navigate the public transport network efficiently, including walking reasonable distances and making timely connections.

3.4.4 In our view, a hotel with a more direct association to Heathrow Airport would offer greater suitability for a broader range of customers. Such a location would allow guests to benefit from dedicated shuttle bus services to and from the airport, thereby enhancing convenience and accessibility.

3.4.5 Allied to this, the Committee Report for Application Ref. 43794/APP/2021/3685 highlighted the Council's planning policy officer's feedback regarding the area of search for the Sequential Test for the property at Axis House, 242 Bath Road. This confirms the following with regard to the area of search:

“Area of Search: I would agree with the assessment that the catchment area should only include towns



*within a travel time by public transport. **The 20-minute travel time sounds reasonable** (it is assumed this has been measured from the public transport terminus at Terminals 2 and 3)."*

- 3.4.6 It was confirmed that the appropriate search area should encompass locations reachable within a 20-minute public transport journey from the terminus at Heathrow Terminals 2 and 3. Initially, the Policy Officer proposed considering sites within the town centres of Feltham, Staines, Slough, and Ealing. However, as outlined in the Applicant's Updated Sequential Test, these locations are unsuitable as they do not meet the criteria for a hotel intended to serve the Heathrow Airport market. This was found acceptable by the Council in the issue of its decision to grant planning permission at the site.
- 3.4.7 We make reference below, to relevant legal precedents concerning the application of pragmatism in site selection. Notably, the judgment in CBRE Lionbrook (General Partners) Ltd v Hammerson (Rugby) Ltd [2014] affirmed that a pragmatic approach is essential when applying the sequential test. Pragmatism, in this context, is understood to be "the quality of dealing with a problem in a sensible way that suits conditions that really exist, rather than following fixed theories, ideas or rules."
- 3.4.8 This inherently requires consideration of the operational realities of a Heathrow hotel businesses, including the necessity to trade profitably and the components that underpin their commercial viability. Accordingly, locations that are theoretically suitable or situated in centres with no meaningful connection to Heathrow Airport should not be considered.
- 3.4.9 It is highly improbable that a traveller with an early flight would opt to stay in Feltham, Staines, Slough, or Ealing. To assume otherwise would be inconsistent with a pragmatic and commercially realistic assessment. On that basis, we continue to discount these centres.
- 3.4.10 As previously noted, allocated sites within the London Borough of Hillingdon have been used as a basis to inform the search. Regarding Hounslow, the Hounslow Proposed Submission Version (Regulation 19) (2024) has been referenced to identify potential sites within Hounslow West that may be available and better suited. In relation to Ealing, we have considered sites within the emerging Regulation 22 Local Plan, specifically the sites in Southall as this centre was agreed as an area of search in other Sequential Tests.
- 3.4.11 Additionally, the site spans approximately 1 hectare, and therefore only sites of comparable size have been considered in this assessment. The site is deemed suitable to accommodate a hotel of 206 beds, along with associated car parking, coach parking, and taxi servicing. A smaller site would present spatial constraints, necessitating a reduced floorplate and a taller building to accommodate the proposed scale of development. As part of the pre-application process, the Policy Officer has suggested that a suitable site should accommodate between 150 and 203 beds. However, we do not consider this approach to be pragmatic. The proposed development is for a hotel of 206 beds, a figure derived directly from the operator's established business model. Reducing this capacity would raise significant concerns regarding the commercial viability and operational success of the hotel. Accordingly, we have maintained our requirement that only sites capable of accommodating a 206-bed hotel be considered suitable.



3.4.12 Further comments made during the pre-application discussion from officers were that the Sequential Test should review the potential for sites that are located on the open market such as Rightmove. We have therefore reviewed the following websites for potential sites within the areas that are on the open market. These are:

- Rightmove,
- Loopnet,
- Primelocation,
- Onthemarket,
- DTRE,
- Completely Retail.

3.4.13 Further relevant legal precedents are summarised below.

3.4.14 In summary, the application of the sequential test involves:

- Evaluating the availability of suitable sites in locations that are sequentially preferable.
- Taking into account the market and locational requirements relevant to the proposed use.
- Ensuring that the assessment is proportionate and appropriately aligned with the specifics of the proposal.
- Demonstrating flexibility to confirm that more centrally located sites have been thoroughly considered.

3.4.15 In interpreting the requirement for flexibility, the *Supreme Court in Tesco Stores Ltd v Dundee City Council* [2012] UKSC 13 held that the definition of 'suitable' should be considered in relation to the design of the developer's proposal, provided that flexibility and realism are *appropriately demonstrated*.

3.4.16 The principles governing the suitability of an alternative site were also examined in *R (on the application of Zurich Assurance Ltd T/A Threadneedle Property Investment) v North Lincolnshire Council* [2012]. At paragraph 62 of the judgment, the Court held:

"Working in the real world, the committee were entitled (and indeed, bound) to take into account the evidence that any arrangement in which Marks and Spencer used the TJ Hughes unit (the only available unit in Scunthorpe town centre) would not be commercially viable, and that, because of that lack of viability, Marks and Spencer would not locate to Scunthorpe town centre in the event that this Application for the site was refused."

3.4.17 It was further held that the issue of suitability must be assessed in relation to the developer's proposals. The judgment in *CBRE Lionbrook (General Partners) Ltd v Hammerson (Rugby) Ltd* [2014] also affirmed



that pragmatism is essential in the sequential test. Pragmatism, in this context, refers to the ability to address a problem in a practical manner that aligns with actual conditions, rather than adhering strictly to fixed theories, ideas, or rules.

3.4.18 By definition, this approach must take into account the operational needs of retailers functioning in a real-world environment, where profitability depends on various components of their underlying business model.

3.4.19 In *Regina v Braintree District Council Ex Parte Clacton Common Development Limited* (2000), George Bartlett QC concluded that it was not necessary to look at potential alternative sites in every centre that fell within the catchment area of the proposed development. It had been contended that potential alternative sites in every centre within the proposed development catchment area should be considered. However, in reaching his judgment Mr Bartlett QC stated that a site examined some distance from the application site would effectively have its own catchment area which may only include a part of the original catchment area of the application site.

3.4.20 George Bartlett QC ruled that assessing alternative sites in every centre within a catchment area is unnecessary. He reasoned that a site located farther from the application site would have its own distinct catchment area, potentially overlapping only partially with the original

3.4.21 Therefore, in summary:

- Define 'suitability' in context: Ensure flexibility and realism when assessing site suitability, as established in *Tesco Stores Ltd v Dundee City Council* [2012].
- Consider commercial viability: A site must be viable for the intended use, as demonstrated in *Zurich Assurance Ltd v North Lincolnshire Council* [2012].
- Apply pragmatism in the sequential test: Adopt a practical approach rather than rigidly following theories, as confirmed in *CBRE Lionbrook v Hammerson (Rugby)* [2014].
- Factor in operational needs: A site must align with the underlying business model to ensure profitability.
- Maintain an 'operator-blind' assessment: While site suitability should not depend on a specific retailer, the general trading characteristics of the proposed retail development remain relevant.
- Targeted assessment of alternative sites: It is not necessary to evaluate potential sites in every centre within the catchment area of a proposed development.
- Consideration of catchment areas: A site located further from the application site may have a distinct catchment area that only partially overlaps with the original one.
- Judgment-based site selection: Site suitability should be assessed pragmatically, ensuring a reasonable approach to defining viable location.



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SECTION 4

Sequential Test



4.0 Sequential Test

4.1 London Borough of Hillingdon

- 4.1.1 At the request of the Local Authority, we have provided the sequential test in a tabulated form which is within the Appendix of this document. This document also includes a review of recent committee decisions of sites of a similar scale within the relevant Boroughs, at the request of the local authority.
- 4.1.2 The site search has demonstrated that there are no sites within a 20-minute public transport catchment of Heathrow Airport Terminus 2/3 that are of sufficient size, availability, or suitability to accommodate a 206-bedroom hotel. Extending the search beyond a 20-minute travel time would be unreasonable, as a hotel located outside this catchment would serve a different market and would not adequately meet the operational needs of Heathrow Airport.
- 4.1.3 This conclusion is supported by the accompanying application documents, including the Hotel Needs Assessment prepared by Colliers, which confirms a clear unmet demand for hotel accommodation at this location and identifies a high likelihood of displacement to neighbouring boroughs in the absence of additional provision. The assessment also highlights a particular shortage of hotels within the mid-market sector, further demonstrating strong demand for the type of accommodation proposed.



SECTION 5

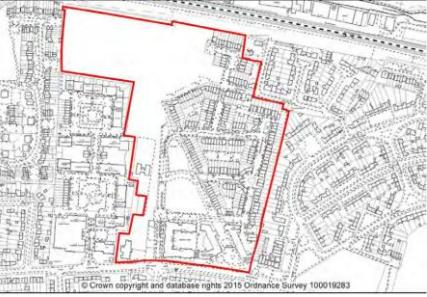
Conclusion



5.0Conclusion

- 5.1.1 This report demonstrates that a comprehensive search has been conducted for sites within the catchment area of the proposed development, approximately within a 20-minute public transport travel distance. The assessment examined the closest town centres for a site capable of meeting the hotel's requirements and offering a suitable location near Heathrow Airport.
- 5.1.2 As a result, no suitable, available, or viable sites have been identified within or on the edge of the town centres of West Drayton (LB Hillingdon), Hayes (LB Hillingdon) Hounslow West (LB Hounslow), and Southall (LB Ealing) for the proposed hotel scheme.
- 5.1.3 The weight afforded to the sequential test remains at the discretion of the decision-maker. In this regard, case law establishes that the weighting and determination must be realistic and flexible.
- 5.1.4 Applying a common-sense approach to the sequential assessment, it is concluded that the application site, located beyond an 'edge of centre' position and not allocated for hotel use, meets the requirements of the sequential test. This conclusion is based on the absence of suitable, available, and viable sites within town centre or edge-of-centre locations capable of accommodating the proposed development.
- 5.1.5 Accordingly, the application proposal is fully compliant with the sequential test as outlined in Section 7 of the National Planning Policy Framework (NPPF).



Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
London Borough of Hillingdon					
Former NATS Site, Porters Way, West Drayton 12 hectares LB Hillingdon		Historic planning permission to redevelop estate. Has been built out.	Allocated residential site LB Hillingdon. Not on the open market.	The site previously received planning permission for 773 homes, along with a variety of amenities, including retail spaces, a nursery, and a healthcare facility. It appears that development has recently been completed.	This is built out and occupied, it is improbable that a proportion of the site will be built on as a hotel.
Former West Drayton Police Station 0.55 hectares LB Hillingdon		Historic planning permission for 43 units.	Allocated residential site LB Hillingdon. Not on the open market.	The site appears to have been recently developed for residential purposes.	Given its relatively small size and the designation for residential, and due to the fact it has been built out and occupied for residential. The site is unlikely to come forward for a hotel.



4 Tavistock Road, West Drayton, UB7 QT LB Hillingdon		No relevant planning history found.	Identified in previous Sequential Tests carried out in the Borough for Heathrow hotels. Our search has not shown that the site is available on the open market.	Occupied by existing retail units on a prominent corner plot.	It is currently occupied by various retail units, making tenant negotiations for vacancy unfeasible in the short term. Additionally, the site is relatively small, situated on a corner plot at a busy junction, and unable to accommodate a hotel of the proposed scale. This limitation is further worsened by the requirements for servicing and parking. Consequently, the site is clearly unsuitable for the intended use and discounted.
De Burgh Arms, High Street, Yiewsley, West Drayton, UB7 7DQ 0.127 hectares LB Hillingdon.		Ref. 8053/APP/2022/1406 Was refused and dismissed at appeal in 2022, which sought to change the use of the outbuilding from nightclub to a Thai massage parlour. No other recent Planning history found.	Identified in previous Sequential Tests carried out in the Borough for Heathrow hotels. Our search has not shown that the site is available on the open market.	Currently occupies a corner plot and is actively operating as a pub. Main building is Grade II Listed.	Given its relatively small size, accommodating the proposed hotel scheme would necessitate the demolition of the existing building. However, as the property is Grade II listed, demolition is unlikely to be permitted. The scale of the proposed development cannot be feasibly accommodated on this site



			the open market.		
143 – 161 High Street, Yiewsley, UB7 7QH 0.53 hectares LB Hillingdon		No relevant planning policy found.	Identified in previous Sequential Tests carried out in the Borough for Heathrow hotels. Our search has not shown that the site is available on the open market.	Large format retail store approximately 0.6km from public transport hub.	Located approximately 0.6 km from West Drayton Train Station. For individuals traveling with large luggage, this distance may not be practical for walking. Additionally, the site currently accommodates a large, actively trading Aldi superstore and car park, making its availability for redevelopment unlikely in the short term. Therefore, the site should remain discounted.
Land At The Rear Of The Railway Arms Public House Station Road West Drayton UB7 7BT 0.012 LB Hillingdon		No relevant planning policy found.	Identified in previous Sequential Tests carried out in the Borough for Heathrow hotels. Our search has not shown that the site is available on the open market.	Land to the rear of the public house. Main building is Grade II Listed.	Land to the rear of the public house is insufficient to accommodate the proposed hotel scheme. As the public house is a Grade II Listed Building, introducing a high-traffic generating hotel within this setting would not align with the historical and architectural significance of the heritage asset.



			the open market.		
Trout Villa, Trout Road, Hillingdon, West Drayton, UB7 7RT 0.447 hectares LB Hillingdon		Planning applications associated with the use as a waste site.	Identified in previous Sequential Tests carried out in the Borough for Heathrow hotels. Our search has not shown that the site is available on the open market.	Located approximately 0.5 km from West Drayton Station. Located in an industrial location. Partly within Flood Zone 3.	Lacks convenient public transport links, reducing its appeal for customers heading to Heathrow Airport. Additionally, the Government's flood risk map designates the site as being in a high-risk area for annual flooding.
Kitchener House, Yiewsley 0.79 hectares LB Hillingdon		Ref. 18218/APP/2013/2183 – for 23 units in 2023.	Identified in the Site Allocations Document. Our search has not shown that the site is available on the open market.	Relatively small site area and recently occupied by new residential development.	The site is designated for residential use in the Council's Site Allocations Document. It previously received planning permission for 23 residential units (Ref. 18218/APP/2013/2183), which appear to have been completed. Additionally, the site's limited size prevents it from accommodating the proposed hotel scheme. As a result, the site is neither suitable



					nor available for hotel development.
The Blues Bar, Yiewsley 0.284 LB Hillingdon		Site previously had planning for 38 units. This appears to have been built out and occupied.	Identified in the Site Allocations Document Our search has not shown that the site is available on the open market.	Site is occupied with residential following a grant of planning permission.	The site is allocated for residential use in the Council's Site Allocations Document. It previously received planning permission for 38 units, which appear to have been recently completed. Given this, the site is unlikely to be available for a hotel scheme in the short term and remains discounted.
Old Vinyl Factory, Blyth Road LB Hillingdon		Outline planning permission (59872/APP/2012/1838) For 510 units.	Identified in the Site Allocations Document. Our search has not shown that the site is available on the open market.	Major planning permission which is being built out and occupied.	The site appears to be fully built out and occupied, it is unlikely to be available for hotel use in the short term and therefore it is discounted.



Goldmark House, Blyth Road		Part of the Old Vinyl Factory Permission	Identified in the Site Allocations Document. Our search has not shown that the site is available on the open market.	Major planning permission which is being built out and occupied.	The site appears to be fully built out and occupied, it is unlikely to be available for hotel use in the short term and therefore it is discounted.
Fairview Business Centre, Clayton Road, Hayes		(58758/APP/2019/3517) in 2023 for demolition and residential use, commercial and retail spaces.	Our search has not shown that the site is available on the open market.	Major planning permission which is being built out and occupied.	The site appears to be fully built out and occupied, it is unlikely to be available for hotel use in the short term and therefore it is discounted.
Union House 23 Clayton Road Hayes UB3 1AA		Various applications for prior approval requests office to residential.	Our search has not shown that several of the residential units are listed on the open market for sell.	Located in an existing office area, however, the office to residential prior approval implemented with the building occupied.	Converted from offices to residential use under permitted development. The site adjoins an operational office building that appears to share part of the car parking area for the residential block, further limiting parking availability for a hotel use. Given that the site is actively in residential use and lacks sufficient



					parking, it remains unsuitable and should continue to be discounted.
Land on the north-east side of Nestles Avenue, Hayes		Previous planning permission for residential use across the site.	Our search has not shown that the site is available on the open market.	Large site fully occupied by residential.	Allocated for residential use in the Site Allocations Document and appears fully built out and occupied. Given its current status, it is not suitable or available for hotel use in the short term.
Silverdale House, Pump Lane, Hayes, UB3 3NB		Planning permission for re-cladding for existing purpose	Our search has not shown that the site is available on the open market	The site is an active builders depot and located in a strategic industrial location. Various planning permissions obtained to re-clad.	An active industrial unit within an industrial estate and not on the open market, therefore discounted.



Land And Buildings On The South West Side Of Silverdale Road		Part of the site has recently received a resolution to grant planning permission (49261/APP/2024/2904) for a data centre	Our search has not shown that the site is available on the open market	The site is an industrial site with an emerging industrial related permission	The site was heard at planning committee on the 12th of March 2025 and we expect the permission for the data centre to be implemented.
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Additional Sites

The Common, West Drayton, UB7 7HQ Source: Loopnet		No planning permissions found.	On the market via Loopnet	The site is located outside of the town centre of West Drayton and within an industrial estate.	Given these factors it has been discounted.
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Office unit, Horton Road, West Drayton UB7 8JD Source: Vail Williams		No planning permissions found.	On the market via Vail Williams.	The site measures approximately 1,000 sqm whereas the application site is circa 6111 sqm. The site only comes with 25 car parking spaces	The site is too small for the proposed hotel and therefore has been discounted.
The Green, West Drayton, UB7 7PN Source: Rose Williams		No planning permission found	On the market via Rose Williams	The site measures 232 sqm and the application site measures 6111 sqm. The site only comes with 10 car parking spaces	The site is too small and has been discounted.



Liddall Way, West Drayton, UB7 8PG		No planning permissions found.	On the market via Telsar	The two units available measure 289 sqm and the application site measures 6111 sqm. The site is located within an existing industrial estate and only comes with 30 car parking spaces	The site is too small and located within an established industrial area. The site does not come with enough car parking to support the hotel and as such it has been discounted.
15 Bentinck Rd, West Drayton, UB7 7SG		No planning permissions found.	On the market via Langham Estate Agents	Ground floor office unit measuring 600 sqm	The site is too small and has been discounted.



70 High Street,		Permission for change of use from gaming arcade to retail unit. Ref 3862/APP/2009/653	On the market via Movement Estate	The property is the end retail building within an established retail parade. The property measures 278 sqm.	The site is in retail use within an existing retail parade. The site is too small.
Compound 1, Trout Road, West Drayton, UB7 7RU		Site allocated for mixed use development and contains a range of permissions for residential development	On the market via David Charles Property	Existing employment site and allocated for redevelopment. The property particulars state that the site is available only until February 2026.	On the basis that the site is allocated and has permission for residential and due to the site only available until February 2026. This has been discounted.



		No planning permissions found	On the market via IPIF	The site measures 229 sqm and is located within an established industrial estate.	The site is too small and located within an industrial estate.
Viveash Clo, Hayes, UB3 4RZ		No planning permissions found.	On the market via M3M	The site is located within an industrial estate and measures 1897 sqm, as such it is too small and has been discounted.	The site is located within an industrial estate and measures 1897 sqm, as such it is too small and has been discounted.



460-464 Uxbridge Road, Hayes, UB4 0SD		No planning permissions found.	On the market via Vine Estates	The site is an existing co-working office and has a combined floorspace of 743 sqm.	The site is constrained and an existing office. The site is too small and doesn't provide any car parking, as such it has been discounted.
London Borough of Hounslow					
Central Park Trading Estate		The site allocated within Hounslow Reg 19 Document.	The site is currently on the market by DTRE and being sold as new industrial units.	The site is currently within the green belt and adjacent to a Site of Importance for Nature Conservation (SINC).	A number of environmental constraints and designated in the LSIS and on the market for industrial use. Therefore, not suitable for a hotel.



Hounslow Cavalry Barracks		<p>Site is allocated within the Hounslow Regulation 19 Document for residential development of up to 1,000 homes and 3,000 sqm of retail floorspace. It also has 14 listed buildings. Understood planning been granted at the site for 1,525 residential units.</p>	<p>The site appears to be on the market by CBRE, however, it is being sold as a residential opportunity.</p>	<p>Allocated for residential and has a number of constraints</p>	<p>Due to the fact it is being sold for residential with a residential permission, it has been discounted.</p>
Hounslow West Station		<p>Not aware of any planning permissions.</p>	<p>Our search has not shown the site to be on the open market.</p>	<p>Within the Hounslow Regulation 19 Document for residential development comprising 360 homes and 1,400 sqm of retail and leisure space. The allocation also includes provisions for enhanced station facilities, with the station itself being Grade II listed</p>	<p>Station site and allocated for residential, retail and leisure. Not suitable for hotel use.</p>



Land at Green Lane		Not aware of any planning permissions. Regulation 19 Document for 10,270 sqm of industrial floorspace.	Our search has not shown the site to be on the open market.	It adjoins the Green Belt and Metropolitan Open Land (MOL) and is partially located within Flood Zone 2	Site has a number of constraints and proposed for industrial floorspace.
Builders Yard, 379 – 389 Staines Road		Planning permission P/2019/3935 to provide 64 flats Regulation 19 document for 580 sqm of industrial floorspace and 20 residential units	Our search has not shown the site to be on the open market	Site measures 0.35 hectares and has permission for 64 units	The site is too small and appears to have a residential consent. The
Heathrow Trading Estate		Regulation 19 Document for 18,000 sqm of industrial floorspace.	Our search shows that some of the units within the Heathrow Trading Estate are on the market to let by a number of industrial agents	Within a Locally Significant Industrial Site and designated to support the Borough's employment needs. Additionally, the site is partially located within Flood Zone 3 and adjacent to a Site of	A number of constraints, including a significant draft allocation continued industrial use. A hotel would not be suitable.



			Importance for Nature Conservation (SINC).	
Vacant Land at Dick Turpin Way		11,900 sqm of industrial floorspace, intended to support the borough's emerging employment needs	Part of the land appears to be for sale by Colliers.	The site is within Green Belt and a potential LSIS within the emerging Plan
Site at Faggs Road		Regulation 19 Document for 5,950 sqm of industrial floorspace to support the borough's emerging employment needs	Our search has not shown the site to be on the open market	Flood Zone 2, Draft Allocation



				site has been discounted
Tesco Duke Green Avenue		<p>Regulation 19 Document for a new retail superstore, 210 homes. No planning permission apparent.</p>	<p>Our search has not shown the site to be on the open market</p>	<p>Draft allocation, existing superstore.</p> <p>The site is proposed for allocation within the Regulation 19 Document for a new retail superstore, 210 homes, and open space. The new retail superstore is likely to require significant levels of new parking. It is bordered by a Local Open Space to the east, necessitating significant landscape buffering. Given these constraints, the site is unable to accommodate a hotel development along with its associated parking and servicing requirements. As a result, the site has been discounted.</p>
Land at Hatton Field		<p>Regulation 19 Document for 63,450 sqm of industrial and employment floorspace. No apparent planning permission.</p>	<p>Our search has not shown the site to be on the open market</p>	<p>The site is proposed for allocation within the Regulation 19 Document for 63,450 sqm of industrial and employment floorspace, designated as a key employment area to support the Borough's future</p>



					<p>workforce needs. A portion of the site is set to be released from the Green Belt and re-designated as a Local Significant Industrial Site. A large portion is to remain within the green belt. Additionally, the site is planned to include natural zones and biodiversity enhancement areas. Given these factors, the site is not suitable or viable for hotel development.</p>
Additional Sites					
Unit 20A,20B &20C Hanworth Road		No planning permissions found	On the market via Vokins Chartered Surveyors	The site is a tight back of terrace site with constrained access. The site is in industrial use and measures just 989 sqm	The site is constrained by its access and shape and is too small. Therefore, it has been discounted.



2-2B Hanworth Road, The Tankerville Building, TW3 1UA		No planning permissions found.	On the market via Sneller Commercial	Existing retail unit located within an existing retail parade. Measuring 254 sqm	The site is constrained and only the ground and basement floors are available. As such, the site has been discounted.
St Johns Road, Isleworth, TW7 6NJ		No planning permissions found	On the market via De Souza	The site is located within an industrial estate and outside of Hounslow West Town Centre. The property measures 346 sqm.	Due to these issues the site has been discounted.



Unit 14 -17 Heathrow Trading Estate		No planning permissions found	On the market via DTRE	Located within an existing industrial estate within LSIS and measures 4628 sqm	On sale for industrial and within an established industrial estate. The site is also too small. Therefore, it has been discounted.
London Borough of Ealing		Regulation 22 Document for a residential-led development incorporating retail and community uses, including a new purpose-built Gurdwara	Our search has not shown the site to be on the open market	See evaluation.	The site is proposed for allocation within the Regulation 22 Document for a residential-led development incorporating retail and community uses, including a new purpose-built Gurdwara. The site must also accommodate parking for the Gurdwara, which typically has a high parking demand, as well as parking and servicing provisions for the station. Thus, a large area of the site will need to remain for car parking. Given these requirements, it would



					not be feasible to incorporate the proposed hotel development along with its associated needs for parking, coach parking, and servicing. Consequently, the site has been discounted.
Southall Sidings UB1 3AD		(201888FUL) for the construction of affordable and market homes across five blocks.	Site appears to be owned by a residential developer and does not appear on the open market.	A number of constraints including a recent permission.	The site is proposed for allocation within the Regulation 22 Document for a residential mixed-use scheme. It also has planning permission (201888FUL) for the construction of affordable and market homes across five blocks. The site is owned by a residential developer, with various condition and amendment applications having been submitted. Given these factors, it is clear that the site is not available for the proposed hotel development. The site has therefore been discounted.



Former Sorting Office, South Road, UB1 1RB		<p>Regulation 22 Document for a residential-led mixed-use scheme, which includes the retention of community facilities</p> <p>Permission for 41 residential units</p>	<p>Our search has not shown the site to be on the open market</p>	<p>Allocation for community use and listed building on site.</p>	<p>The site has been discounted due to a number of constraints including its recent permission. As such, the site has been discounted.</p>
Southall West London College, Beaconsfield Road, UB11RB		<p>Within the Regulation 22 Document for a residential, education, and community use development, with a requirement to enhance education and community facilities.</p> <p>The site has received planning permission for the redevelopment of 118 residential units (203705/FUL).</p>	<p>Our search has not shown the site to be on the open market</p>	<p>Site within Flood Zone 3 and number of planning constraints including recent permission.</p>	<p>Given these constraints and its designation for residential, community, and educational purposes, the site has been discounted for hotel use.</p>



31-45 South Road, Southall, UB11SW		Proposed allocation for residential use and community facilities, with partial retention of the existing telephone exchange.	Our search has not shown the site to be on the open market	The site is within Flood Zone 3 and approximately 1.04 hectares and adjacent to a SINC.	Given the constraints, the site has been discounted.
30 Shrubbery Road & 39-47 High Street, Southall, UB1 SWB		Proposed for a residential-led mixed use scheme which includes office, education and community use.	Our search has not shown the site to be on the open market	The site measures 1.06 hectares and has a proposed allocation	Given the constraints, the site has been discounted.



<p>13 – 19 the Green and 10 Merrick Road, UB2 4AU</p> <p>Page 424</p>		<p>Regulation 22 Document for a residential-led mixed-use scheme</p> <p>Part of the site has permission for 22 storey mixed use development including 215 flats.</p>	<p>Our search has not shown the site to be on the open market</p>	<p>Allocation is for enhanced office, education and community uses. The site measures approximately 1.06 hectares.</p>	<p>Alongside the proposed allocation uses and the permission, the site would not be large enough to accommodate a new hotel..</p>
<p>Middlesex Business Centre, Bridge Road, Southall, UB2 4AB</p> <p>Page 425</p>		<p>Regulation 22 Document for a mixed-use development incorporating residential, health, community, and commercial/retail uses.</p> <p>Planning permission for outline and reserved matters at the site for 867 homes, a hotel, retail floorspace and new east-west kink.</p>	<p>Our search has not shown the site to be on the open market</p>	<p>The site is accommodating a number of proposed uses including a hotel. The site is also in Flood Zone 3.</p>	<p>Given that a hotel is already in development at the site, it is considered that another hotel alongside this would not be viable. There isn't any information online to suggest that the hotel is available to purchase</p>



The Green, Southall, UB2 4BZ		<p>Proposed allocation for residential, commercial, employment, and community floorspace.</p> <p>Flood Zone 3</p> <p>Planning permission obtained (215058FULR3) for uses set out in the allocation</p>	<p>Our search has not shown the site to be on the open market</p>	<p>The site accommodates a number of uses and has planning permission for the allocated uses.</p>	<p>Given these factors, the site is unlikely to become available for hotel development in the short term and has therefore been discounted.</p>
The Straight, Southall, UB1 1QX		<p>Proposed for allocation for residential, commercial, employment, school, and health centre uses.</p> <p>Flood Zone 3</p> <p>Planning permissions have already been granted for the range of uses outlined in the allocation.</p>	<p>Our search has not shown the site to be on the open market</p>	<p>The site is proposed to be allocated and has permission</p>	<p>Given these factors, the site is unlikely to become available for hotel development in the short term and has therefore been discounted.</p>



Scotts Road, Southall, UB2 5DD		Proposed for allocation as a residential-led mixed-use development, incorporating some industrial floorspace.	Our search has not shown the site to be on the open market	0.59 hectares and narrow site	The site is proposed for allocation as a residential-led mixed-use development, incorporating some industrial floorspace. With a total area of 0.59 hectares, the site is clearly of an insufficient size to accommodate the emerging hotel scheme alongside its designated uses. As a result, the site has been discounted
Endsleigh Industrial Estate		Planning permission for a new residential block (190140/FUL), which appears to have been implemented.	Our search has not shown the site or any of the units to be on the open market	The site is primarily used for commercial purposes, with a significant number of residential properties surrounding the plot and ongoing residential developments under construction. It is proposed for allocation as a mixed-use development incorporating residential and	Given these constraints, the site has been discounted.



				industrial uses. A portion of the site lies within Flood Zone 3.	
Additional Sites					
Bridge Road, Southall		No planning permissions found	On the market via Hilton Estates	Small industrial units within an existing industrial estate measuring 120 sqm.	The site is too small.
The Broadway, Southall		No planning permissions found	On the market via Ashford Finance and Property Services	Six commercial units along an existing retail parade.	Constrained site and too small to accommodate the proposed hotel.



Bridge Road, Southall, UB24AB		A range of permissions associated with industrial use.	On the market via Monarch Commercial.	The property is located within an industrial area within a LSIS and measures 4738 sqm	The site is within an designated industrial area and is not large enough to accommodate the proposed hotel.
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