



Sequential Test



Client Name: Toyoko Inn., Co Ltd
Site Address: Capital Place, 120 Bath Road,
Heathrow, UB3 5AN
Date: June 2026



Document control

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SECTION 1

Introduction



1.0 Introduction

- 1.1.1 This Sequential Test has been prepared and resubmitted in support of 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.
- 1.1.4 This report has been updated to respond to the comments made from officers regarding the approach to the sequential test made during the determination of the planning application.
- 1.1.5 Following submission of the planning application in December 2025 (Ref. 367298/APP/2025/3224), the Council issued a request for further updates to the Sequential Test in an email dated 19 March 2026. A detailed response was subsequently provided in a note prepared by CarneySweeney on 26 March 2026. A further meeting was held on 21 April 2026 to discuss the Council's comments, after which the Council issued an additional note on 28 April 2026 setting out its preferred approach to the Sequential Test. This correspondence is included at Appendix A.
- 1.1.6 For context, the original list of sites is contained at Appendix B. At Appendix C we have provided a table responding to the Council's comments on a number of sites we originally identified within the initial search area (55 sites). Appendix C contains our further review of additional sites (34 sites), including smaller sites and centres not previously assessed. In total, 89 sites have now been reviewed.
- 1.1.7 We consider that this Sequential Test robustly demonstrates that the 120 Capital Place site represents the most logical and appropriate location for the proposed hotel use. Throughout the assessment, we have consistently emphasised the importance of applying a degree of pragmatism when considering the suitability and availability of alternative sites. It is clear that 120 Capital Place offers a highly accessible and operationally convenient location for a hotel serving the continually expanding Heathrow Airport.



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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.
- 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..
- 2.1.6 Notwithstanding this, following consultation with the Council during the negotiation of the application, the following parameters were agreed with the regard to the Sequential Test principles:
- The site is considered suitable for hotel use, however, a policy hurdle remains. In this context, during the post submission stage, the Council requested a review of smaller alternative sites (i.e. those capable of accommodating a 150-room hotel).
 - The Council noted that pragmatism would be applied when determining whether smaller sites within town centres are genuinely appropriate locations for a hotel serving Heathrow and wider area.
 - The Council asked for the search to include Feltham and Staines.



- The Council asked for the search to be updated to reflect a straight line five-mile radius from Heathrow.
- Officers confirmed that presenting the assessed sites in a tabulated format is appropriate. These are available within the appendix of this document.
- The Council advised that reliance on fragmented land ownership, and the associated difficulty of securing agreement from multiple landowners to release their sites, does not constitute a sufficiently robust justification for discounting a site.
- The Council indicated that the argument relating to car-parking requirements should be significantly moderated and should not be presented as a primary basis for ruling out a site.
- The Council stated that the fact a site is allocated for residential or mixed-use development within the adopted development plan is not, in itself, a strong enough justification to discount it from consideration.



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.

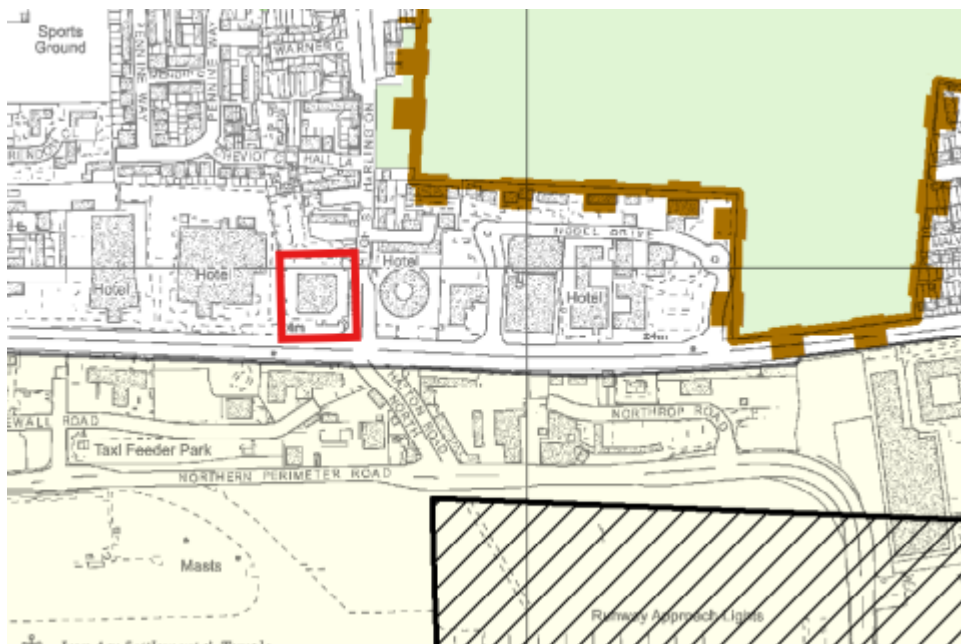
3.1.6 To note, as per the requirement of other Sequential Tests found acceptable within the Borough, we have also reviewed allocated sites in the London Borough of Hillingdon and Hounslow, as per accepted methodology elsewhere.

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. However, following the submission of the application (Reff. 367298/APP/2025/3224) the methodology was updated to include all of the following:

- The assessment includes sites that are capable of accommodating a 150 bed hotel;
- The assessment includes that are within a straight-line five mile radius from Heathrow and within a 20-minute public transport radius of Heathrow.
- The assessment also includes the centres of Feltham and Staines.



3.4.2 We have reviewed 89 sites across the the following centres:

- West Drayton – LB Hillingdon
- Hayes Town Centre – LB Hillingdon
- Hounslow West – LB Hounslow
- Feltham – LB Hounslow
- Southall – LB Ealing
- Sunbury-on Thames – Spelthorne Borough Council
- Ashford – Spelthorne Borough Council
- Whitton – Richmond Upon Thames
- Staines – Spelthorne Borough Council

Area of Search

3.4.3 We initially undertook a search of sites located within a 20-minute public transport journey of Heathrow Terminal 2 & 3. This assessment was carried out using the TfL Journey Planner, which accounts for the full range of public transport options available to individuals, including those with disabilities travelling to and from Heathrow. Officers confirmed that the use of the TfL Journey Planner was an appropriate and acceptable methodology for defining the search area. The below includes extracts of the centres that are within a 20 minute public transport radius.

Terminal 2&3 to West Drayton



Journey results

From: **Heathrow Airport Terminals 1-3, Heathrow Terminals 2 & 3 Rail Station**

To: **West Drayton Rail Station**

Leaving: **Monday 3rd Nov. 12:02**

[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: 7.7km

43 mins

Least walking

Fewest changes

Full step free access

Nearby taxi ranks

12:04 - 12:23
£1.75 anytime

U3 bus to West Drayton Station
19 min [View stops](#)

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

Station information [+](#)

12:05 - 12:31
£1.75 anytime

12:15 - 12:34
£1.75 anytime

Terminal 2&3 to Hayes & Harlington Station



Journey results

From: **Heathrow Airport Terminals 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

Route: Moderate
Distance: 7.8km

43 mins

Walking

Walking speed: Moderate
Distance: 7.1km

1 hr 37 mins

Bus only

Least walking

Fewest changes

Full step free access

Nearby taxi ranks

12:17 - 12:31
£2.10 off peak

14 mins

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

Piccadilly line to Hounslow West

Part Suspended +

7 min [View stops](#)

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

Hounslow West Station

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

12:23 - 12:37
£2.10 off peak

14 mins

.....

12:19 - 12:42

23 mins

.....

12:29 - 12:43
£2.10 off peak

14 mins

.....

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Terminal 2&3 to Southall Station

Journey results

From: **Heathrow Airport Terminals 1-3, Heathrow Terminal 2 & 3 Rail Station**
To: **Southall Rail Station**
Leaving: **Monday 3rd Nov, 12:14**
[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: 9.9km
51 mins

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

12:15 – 12:32 **17 mins**
£7.40 off peak

Transfer to Heathrow Terminals 2 & 3 Rail Station
6 min

Elizabeth line to Southall Station
9 min [View stops](#)

Walk to Southall Station
2 min

Southall Station

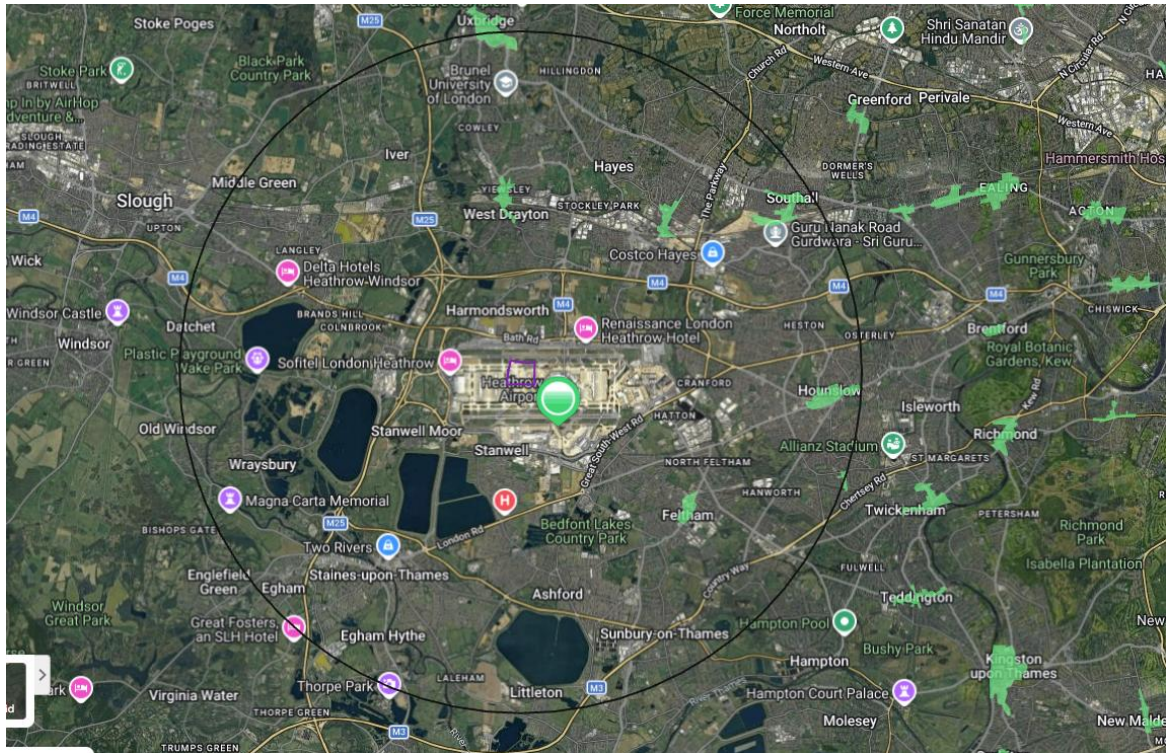
[View details](#) [Map view](#)

12:19 – 12:40 **21 mins**
£7.40 off peak

..... — —

12:30 – 12:47 **17 mins**
£7.40 off peak

- 3.4.4 As mentioned above, during the course of the determination of the application, officers requested that we should also review sites that are within a ‘straight-line’ 5 mile radius of Heathrow Airport. The green patches below represent the town centre boundaries within the 5 mile radius.



- 3.4.5 Please refer to Appendix B for the original lists of sites (55 in total) and Appendix C for our response to the Council's queries on some of the sites from the original search. Appendix C also contains our further review of additional sites (34 in total).

Methodology Continued

- 3.4.6 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."
- 3.4.7 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.
- 3.4.8 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. Notwithstanding this, to aid the Council in its decision-making we have reviewed these centres.
- 3.4.9 Additionally, the site spans approximately 1 hectare, and therefore it is reasonable for similar sized sites to be reviewed. 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. Notwithstanding this, in order to work positively with the Council, we have reviewed smaller sites that may be capable of accommodating a 150 bed hotel.

3.4.10 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.
- Searchland.

3.4.11 Further relevant legal precedents are summarised below.

3.4.12 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.

3.4.13 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*.

3.4.14 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.”

- 3.4.15 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.
- 3.4.16 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.
- 3.4.17 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.
- 3.4.18 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
- 3.4.19 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

- 4.1.1 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 or within a 5 mile straight line radius that are of sufficient size, availability, or suitability to accommodate a 206-bedroom hotel. This search has also now included smaller sites that could potentially accommodate a 150 bed hotel. Extending the search further 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



5.0 Conclusion

- 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 and centres within a 5-mile straight line radius. In total 89 sites have been reviewed.
- 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), Southall (LB Ealing), Feltham (LB Hounslow), Sunbury-on Thames (Spelthorne BC) Ashford (Spelthorne BC), Whitton (Richmond Upon Thames), Staines (Spelthorne BC) for the proposed hotel scheme. We consider that this is a robust search and demonstrates sufficiently that there are no sites immediately available elsewhere to accommodate the proposals.
- 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).



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Appendix A – Correspondence with the Council regarding the Methodology

Debra Bailey

Subject: FW: 36728/APP/2025/3224 Capital Place - Validation

From: Wai Hing Tse <Whingtse@hillingdon.gov.uk>

Sent: 19 March 2026 11:44

To: Mark Westcott <mark.westcott@carneysweeney.co.uk>; Christopher Brady <CBrady@Hillingdon.Gov.UK>

Cc: Giuseppe Cifaldi <giuseppe.cifaldi@carneysweeney.co.uk>

Subject: Re: 36728/APP/2025/3224 Capital Place - Validation

CAUTION: This message originated from outside of Carneysweeney Ltd. Use caution when opening attachments, clicking links or responding to requests for information.

Dear Mark and Giuseppe,

Thank you for your email.

Please find below the comments from our Policy team received this morning. I shall give a nudge to our highways team and give you another update in due course.

Sequential Test for out of town centre proposals

NPPF (2024 Update) paras 91 and 92 state, 'local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.'

London Plan SD7 (Town centres, development principles and development plan documents) discourages non-residential development in out of town centre locations.

The applicant has provided an assessment as requested at pre-application stage. Criteria regarding the presentation of sites in a table has been met in Appendix A, albeit site name, address, size, borough is all in one column so not clearly set out. Information relating to the relevant town centre is not set out as requested at pre-app stage, albeit officers can make an educated guess from the site address as to the town centre it is located in.

In terms of the methodology for the assessment, the report points to 2 neighbouring hotels: 242, Bath Road, UB3 5BJ and 118 Bath Road, UB3 4AJ.

There are 2 approved applications relating to a new hotel use at Axis House, 242 Bath Road - 43794/APP/2017/3704 and 43794/APP/2018/2779. Neither application was supported by a sequential test assessment.

The most recent relevant planning application for 118 Bath Road was for the reconfiguration of an existing hotel and additional apart-hotel building. Reference: 1126/APP/2023/367. Nevertheless, a sequential test was provided in support of the application and sets out that the methodology used was in accordance with agreed advice from Hillingdon Council officers. The test applies a 5 mile radius from the site.

The sequential test in support of this application has a search catchment area limited to town centres within a 20 minute travel time by public transport. It would make more sense to use distance rather than time as a measurement as the test did for 118 Bath Road.

Policy comments at pre-application stage made clear officers expect the following centres to be included: 'West Drayton, Hayes, Hounslow West and Southall. Please discount or include the following in the search: Hounslow Central, Feltham, Staines, Slough and Ealing.' The test only includes centres: West Drayton, Hayes, Hounslow West and Southall. Hounslow Central, Feltham, Staines, Slough and Ealing have been discounted due to the 20 minute travel time restriction.

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The applicant has only considered sites suitable for a hotel with 206 bedrooms, despite pre-application comments requesting a review of sites that could accommodate between 150 and 203 bedroom hotels. The argument for this is that a smaller hotel would not be commercially viable. Information and evidence demonstrating this has not been provided. Planning Practice Guidance clearly states, 'Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.' Therefore, sites that can accommodate a slightly different size of hotel should have been included in the assessment. The site review process focuses only on whether a site could accommodate the proposal and does not apply any flexibility. This is contrary to the NPPF and PPG.

On review of the sites selected:

- 4 Tavistock Road was discounted on the grounds of landownership and need for car parking. Planning Practice Guidance clearly states, '*land ownership does not provide such a justification.*' The site is directly located next to West Drayton station that serves Elizabeth Line trains to Heathrow Airport. It is unlikely the Local Authority would accept high levels of car parking on the site as a result and so this is not a reason for discounting the site.
- De Burgh Arms was discounted due to the need for demolition of a Listed building. No evidence is provided as to why this would be necessary. The building is currently in use as a hotel and could be refurbished and extended to accommodate more bedrooms. The site is located directly next to West Drayton station.

- Old Vinyl Factory was discounted on the grounds it has been fully built out and occupied. This is not the case and therefore a better justification as to why the site would not be suitable for a hotel use should be provided.
- Union House - similar to Tavistock Road.
- The Common - why was this included if it is not in a town centre. Only town centre sites should be included in the sequential test.
- Hounslow West Station - Site is allocated for residential, retail and leisure so why would it not be suitable for a hotel use? Especially one with gym, spa, restaurant facilities. More justification needed.
- Land at Green Lane - same question.
- Tesco Duke Av - same question, why would a hotel not complement retail and resi?
- St Johns Road - why was this included as out of a town centre?
- Southall Crossrail station - Better justification for why a hotel use would not be compatible and why servicing and operational car parking could not be accommodated on a masterplanned site? The site is located directly next to the Crossrail station (PTAL 5) so development should be car-free barring disabled car parking and operational parking. Therefore, car parking provision is not a reasonable justification for discounting the site.
- 30 Shrubbery Road - Inadequate justification. What constraints? The site is allocated for mixed-use development and so a hotel use could be acceptable on the site.
- Endsleigh Estate - As above.

The applicant claims that as a result of the review there are no available suitable sites and therefore the sequential test has been passed. However, on review of the sites and justification provided, it is clear some of the sites could accommodate a hotel use and flexibility should be applied in assessing their suitability in line with PPG.

It also remains unclear whether there are other centres within the radius that could be considered. It would be helpful to have further information regarding the site selection process as there are 2 sites that are clearly unsuitable as they are not located in town centres and therefore, it is not clear why they made the cut.

Transport and Parking

In terms of parking provision, the PTAL for the site is 4.

London Plan Policy T6.4, part A (Hotel and leisure uses parking) clearly states, 'In the CAZ and locations of PTAL 4-6, any on-site provision should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing.' Further, Part C expects that, 'all operational parking must provide infrastructure for electric or other Ultra Low Emission vehicles, including active charging points for all taxi spaces.' Part D and Policy T6.5 (non-residential disabled persons parking) sets out requirements for Blue badge parking for hotel uses. Given the PTAL rating for the site, a car-lite approach to parking provision should be applied, with provision only for operational needs, deliveries and serving, taxis and coaches and Blue Badge parking. Whilst there is a reduction in the number of parking spaces, there is no explanation as to how the applicant has arrived at the figure of 152 spaces. Further, it is unclear what the spaces will be used for and by whom. The TA para 4.3.2 states, 'As these spaces are a retention of the existing provision on site, such a level of parking will not have a detrimental impact on the local highway network.' This is not compliant with London Plan policy.

The TA also states that 8 of the spaces will be provided with active EV provision. This is not compliant with London Plan policy which expects all operational parking to provide active charging points.

In terms of cycle parking provision, London Plan policy T5 expects both long-stay and short-stay parking to be provided. Long stay provision should be 1 space per 20 bedrooms and short-stay should be provided 1 space per 50 bedrooms. Therefore, the proposal should provide 11 long-stay spaces and 5 short-stay spaces (rounding up). The proposal only provides 6 cycle spaces and does not set out whether they are long-stay or short-stay (assumed long-stay as indicated they will be secure and covered). The proposal is not compliant with London Plan policy.

Kind regards

Chris Wai-Hing Tse MRTPI
Senior Planning Officer - Central and South
Planning and Sustainable Growth
Residents Services
Civic Centre (3N/02)
Hillingdon Council



Debra Bailey

Subject: FW: 36728/APP/2025/3224 Capital Place - Validation

From: Wai Hing Tse <Whingtse@hillingdon.gov.uk>

Sent: 19 March 2026 11:44

To: Mark Westcott <mark.westcott@carneysweeney.co.uk>; Christopher Brady <CBrady@Hillingdon.Gov.UK>

Cc: Giuseppe Cifaldi <giuseppe.cifaldi@carneysweeney.co.uk>

Subject: Re: 36728/APP/2025/3224 Capital Place - Validation

CAUTION: This message originated from outside of Carneysweeney Ltd. Use caution when opening attachments, clicking links or responding to requests for information.

Dear Mark and Giuseppe,

Thank you for your email.

Please find below the comments from our Policy team received this morning. I shall give a nudge to our highways team and give you another update in due course.

Sequential Test for out of town centre proposals

NPPF (2024 Update) paras 91 and 92 state, 'local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.'

London Plan SD7 (Town centres, development principles and development plan documents) discourages non-residential development in out of town centre locations.

The applicant has provided an assessment as requested at pre-application stage. Criteria regarding the presentation of sites in a table has been met in Appendix A, albeit site name, address, size, borough is all in one column so not clearly set out. Information relating to the relevant town centre is not set out as requested at pre-app stage, albeit officers can make an educated guess from the site address as to the town centre it is located in.

In terms of the methodology for the assessment, the report points to 2 neighbouring hotels: 242, Bath Road, UB3 5BJ and 118 Bath Road, UB3 4AJ.

There are 2 approved applications relating to a new hotel use at Axis House, 242 Bath Road - 43794/APP/2017/3704 and 43794/APP/2018/2779. Neither application was supported by a sequential test assessment.

The most recent relevant planning application for 118 Bath Road was for the reconfiguration of an existing hotel and additional apart-hotel building. Reference: 1126/APP/2023/367. Nevertheless, a sequential test was provided in support of the application and sets out that the methodology used was in accordance with agreed advice from Hillingdon Council officers. The test applies a 5 mile radius from the site.

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We appreciate the comment in relation to applying flexibility.

London Plan SD7 (Town centres, development principles and development plan documents) discourages non-residential development in out of town centre locations.

The applicant has provided an assessment as requested at pre-application stage. Criteria regarding the presentation of sites in a table has been met in Appendix A, albeit site name, address, size, borough is all in one column so not clearly set out. Information relating to the relevant town centre is not set out as requested at pre-app stage, albeit officers can make an educated guess from the site address as to the town centre it is located in.

We note that officers, while not fully supporting the format of the table, appear to accept the way the table has been drafted. Please advise if this is not the case.

In terms of the methodology for the assessment, the report points to 2 neighbouring hotels: 242, Bath Road, UB3 5BJ and 118 Bath Road, UB3 4AJ.

There are 2 approved applications relating to a new hotel use at Axis House, 242 Bath Road - 43794/APP/2017/3704 and 43794/APP/2018/2779. Neither application was supported by a sequential test assessment.

We do not understand the basis for this comment. Are officers suggesting that hotels in the area may not be required to undertake a Sequential Test?

The most recent relevant planning application for 118 Bath Road was for the reconfiguration of an existing hotel and additional apart-hotel building. Reference: 1126/APP/2023/367. Nevertheless, a sequential test was provided in support of the application and sets out that the methodology used was in accordance with agreed advice from Hillingdon Council officers. The test applies a 5 mile radius from the site.

In relation to the Sequential Test, we have applied a 20-minute public transport catchment whereas the Sequential Test mentioned reviews sites within a 15-minute drive-time radius. The Sequential Test you have referenced includes Feltham (one site) and Staines (one site) in addition to the centres we have already assessed.

To ensure consistency with that approach, we are willing to review these additional centres. However, could officers confirm whether they have a list of potential sites within Feltham and Staines that they would expect us to consider?

The sequential test in support of this application has a search catchment area limited to town centres within a 20 minute travel time by public transport. It would make more sense to use distance rather than time as a measurement as the test did for 118 Bath Road.

We do not consider “as-the-crow-flies” distance to be an appropriate measure of connectivity to centres. Adequate public transport access is essential to demonstrate that centres are genuinely connected. The Sequential Test referenced (Ref. 1126/APP/2023/367) appears to apply a 15-minute drive-time radius.

Policy comments at pre-application stage made clear officers expect the following centres to be included: 'West Drayton, Hayes, Hounslow West and Southall. Please discount or include the following in the search: Hounslow Central, Feltham, Staines, Slough and Ealing.' The test only includes centres: West Drayton, Hayes, Hounslow West and Southall. Hounslow Central, Feltham, Staines, Slough and Ealing have been discounted due to the 20 minute travel time restriction.

We have already reviewed West Drayton, Hayes, Hounslow West and Southall. We are willing to assess sites in Feltham and Staines to ensure consistency with the Sequential Test referenced. Can officers confirm that this is the intention behind the comment?

Officers required a TIM map to be provided confirm where the centres sit within the 20-minute radius. This has not been provided. Instead, screenshots of TfL journey planner have been that show variable journeys, some of which are over 20 minutes. The applicant should provide the map as requested and demonstrate that the discounted centres do not lie within the 20-minute radius.

TIM maps have been requested, yet we understand these are no longer considered suitable as they do not meet accessibility guidance and assume uniform travel times across all mobility levels. We therefore maintain the use of TFL journey planner as the most appropriate.

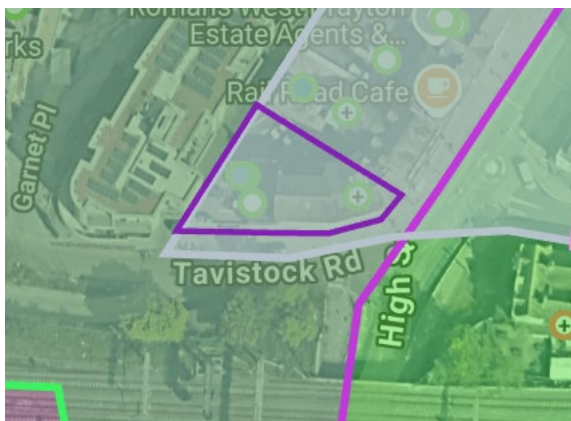
The applicant has only considered sites suitable for a hotel with 206 bedrooms, despite pre-application comments requesting a review of sites that could accommodate between 150 and 203 bedroom hotels. The argument for this is that a smaller hotel would not be commercially viable. Information and evidence demonstrating this has not been provided. Planning Practice Guidance clearly states, 'Is there scope for flexibility in the format and/or scale of the proposal? It is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.' Therefore, sites that can accommodate a slightly different size of hotel should have been included in the assessment. The site review process focuses only on whether a site could accommodate the proposal and does not apply any flexibility. This is contrary to the NPPF and PPG.

We do have some reservations about this approach, as it could result in an unreasonably wide search area. To avoid this, we would welcome agreement from officers on appropriate parameters for the assessment. While a smaller site could theoretically accommodate a hotel, this would likely require a taller and denser scheme, which may not be suitable in many locations.

Our view is that only sites capable of accommodating a hotel of approximately 206 beds should be considered only. Smaller sites would not be practical or reasonable, particularly given that the applicant has based the proposed layout and format on an established and long-operated building. There is no requirement to demonstrate viability, it is important that the Sequential Test reflects realistic development scenarios in this case.

On review of the sites selected:

- 4 Tavistock Road was discounted on the grounds of landownership and need for car parking. Planning Practice Guidance clearly states, '*land ownership does not provide such a justification.*' The site is directly located next to West Drayton station that serves Elizabeth Line trains to Heathrow Airport. It is unlikely the Local Authority would accept high levels of car parking on the site as a result and so this is not a reason for discounting the site.



The site measures approximately 0.05 hectares and cannot reasonably accommodate the scale of development proposed. The Capital Place building alone (excluding the car park) comprises 5,888 sqm. Delivering a new hotel of around 200 rooms would therefore necessitate a building of substantial height and density, which would be inappropriate within a context characterised by existing buildings of only three to four storeys that are within the area.

Although multiple ownerships may not be a formal consideration within the NPPG, the number of individual businesses operating on the site introduces significant complexity. Many may be unwilling or unable to sell their units, further constraining redevelopment potential. This is not a practical point.

Additionally, the site is located in close proximity to residential properties to the rear. Increased servicing requirements and associated vehicle movements would likely result in disturbance to these neighbouring homes.

The site is wholly unsuitable for the scale and nature of development proposed.

- De Burgh Arms was discounted due to the need for demolition of a Listed building. No evidence is provided as to why this would be necessary. The building is currently in use as a hotel and could be refurbished and extended to accommodate more bedrooms. The site is located directly next to West Drayton station.
- It is wholly unreasonable to expect a hotel of the scale proposed to be accommodated adjacent to the listed building, or to assume that such scale could be achieved through

extensions to the existing structure. Delivering development of this magnitude would necessitate substantial extensions or, potentially, demolition of the building, works that would give rise to significant heritage impacts.

- Furthermore, achieving the required floorspace would inevitably involve adding multiple additional storeys. Such vertical expansion would be entirely inappropriate within the established character and scale of the surrounding area.
- Old Vinyl Factory was discounted on the grounds it has been fully built out and occupied. This is not the case and therefore a better justification as to why the site would not be suitable for a hotel use should be provided.

Whilst the site may not have been fully built out, it is allocated for residential, has permission for residential and being occupied as residential. The likelihood that it would be released for a new large hotel is unlikely.

- Union House - similar to Tavistock Road.

The site comprises a range of residential units delivered through a prior approval process for office-to-residential conversion. A review of google imagery indicates that these units are now occupied as homes. It is therefore entirely inappropriate and unreasonable to suggest that these properties could be assembled for redevelopment as a hotel. The fact that they are in active residential use fundamentally undermines any realistic prospect of securing the site for such a purpose.

- The Common - why was this included if it is not in a town centre. Only town centre sites should be included in the sequential test.

Noted

- Hounslow West Station - Site is allocated for residential, retail and leisure so why would it not be suitable for a hotel use? Especially one with gym, spa, restaurant facilities. More justification needed.

The site will need to work hard to accommodate all of the uses identified within the allocation. In addition to these requirements, the site must continue to provide car parking spaces for the train station, alongside the parking, delivery, and servicing needs associated with a hotel use. When these operational demands are considered collectively, it is evident that the site does not have the capacity to practically or efficiently accommodate a hotel of the scale envisaged.

- Land at Green Lane - same question.
- Tesco Duke Av - same question, why would a hotel not complement retail and resi?

The site would need to work hard to accommodate all of the uses identified within the allocation, while also providing the necessary car parking for both the superstore and the proposed hotel. To deliver all of these functions alongside a hotel use, the resulting development would need to be significantly taller and denser than the prevailing built

form. Such a scale of development would be wholly inappropriate in an area characterised predominantly by two-storey buildings.

St Johns Road - why was this included as out of a town centre?

Noted

- Southall Crossrail station - Better justification for why a hotel use would not be compatible and why servicing and operational car parking could not be accommodated on a masterplanned site? The site is located directly next to the Crossrail station (PTAL 5) so development should be car-free barring disabled car parking and operational parking. Therefore, car parking provision is not a reasonable justification for discounting the site.

Again, the site is going to need to work hard to accommodate all uses and to provide the level of car parking needed to accommodate the new uses and to maintain those for the station car park to continue to operate. A new building would need to be substantially tall and this would not be viable from an urban design perspective

- 30 Shrubbery Road - Inadequate justification. What constraints? The site is allocated for mixed-use development and so a hotel use could be acceptable on the site.

The site is allocated for a mix of uses, including office, education, and community functions. The allocation does not support or envisage a hotel use. To accommodate a hotel of the scale proposed, the site would need to operate under significant pressure to deliver the required floorspace alongside the existing allocated uses.

Furthermore, the site appears to have been built out and is fully occupied. Given that the existing units are in active residential use, it would be neither feasible nor practical to assemble the site for redevelopment as a hotel. The presence of established homes fundamentally limits any realistic prospect of accommodating a hotel on this site.

- Endsleigh Estate - As above.

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 industrial uses. A portion of the site lies within Flood Zone 3. Given these constraints the site is not suitable for a hotel.

The applicant claims that as a result of the review there are no available suitable sites and therefore the sequential test has been passed. However, on review of the sites and justification provided, it is clear some of the sites could accommodate a hotel use and flexibility should be applied in assessing their suitability in line with PPG.

In line with established case law, we have sought to take a pragmatic approach to the Sequential Test. This also appears to be the approach taken in Ref. 1126/APP/2023/367, where only a limited number of sites were reviewed. It is important to emphasise that the proposal relates to a hotel serving one of the world's busiest airports, with demand only expected to

increase as a result of the third-runway expansion. The hotel therefore needs to be of an appropriate scale to meet this level of demand.

We have referenced the Hotel Needs Assessment within the planning submission, which identifies both an undersupply of medium and affordable hotel accommodation and evidence of trade draw into neighbouring boroughs. These factors are material and should form part of officers' consideration when determining the appropriate scope of the Sequential Test.

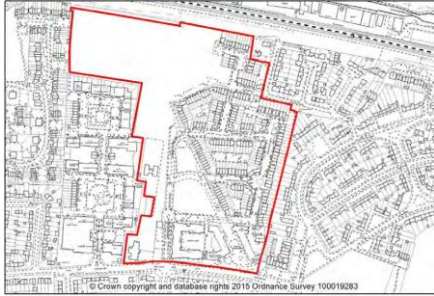
Could you provide a view on this approach?

It also remains unclear whether there are other centres within the radius that could be considered. It would be helpful to have further information regarding the site selection process as there are 2 sites that are clearly unsuitable as they are not located in town centres and therefore, it is not clear why they made the cut.



Appendix B – Original Lists of Sites



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	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

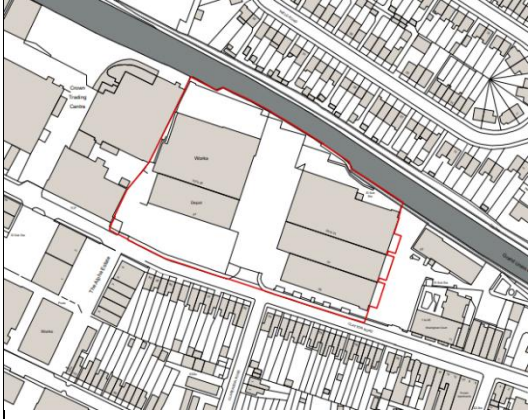
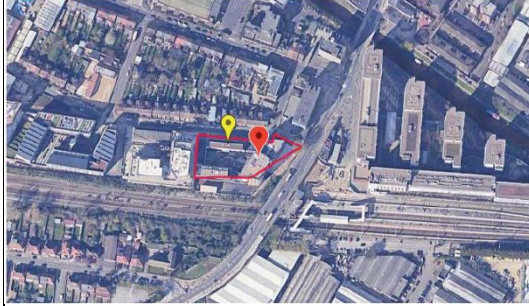
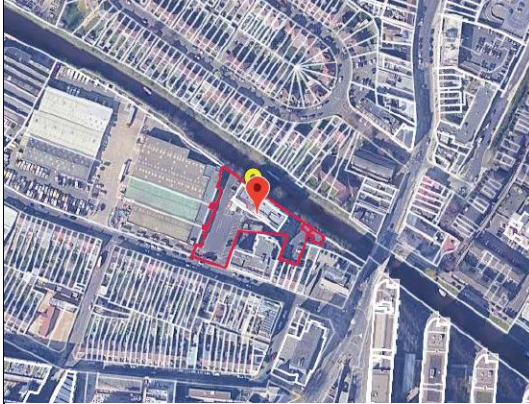
			the open market.		
143 – 161 High Street, Yiewsley, UB7 7QH 0.53 hectares LB Hillingdon		No relevant planning policy found.	Identified in previous Sequential Tests carried out in the Borough for Heathrow hotels. Our search has not shown that the site is available on the open market.	Large format retail 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	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

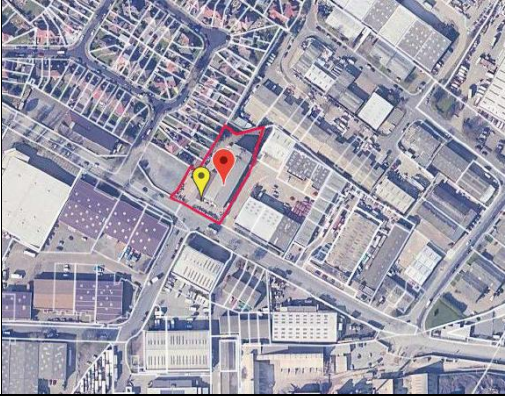


					nor available for hotel development.
The Blues Bar, Yiewsley 0.284 LB Hillingdon		Site previously had planning for 38 units. This appears to have been built out and occupied.	Identified in the Site Allocations Document Our search has not shown that the site is available on the open market.	Site is occupied 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.

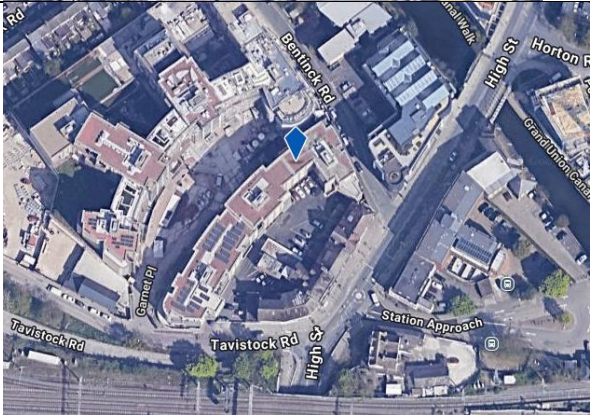


Land And Buildings On The South West Side Of Silverdale Road			Part of the site has recently received a resolution to grant planning permission (49261/APP/2024/2904) for a data centre	Our search has not shown that the site is available on the open market	The site is an industrial site with an emerging 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.
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.

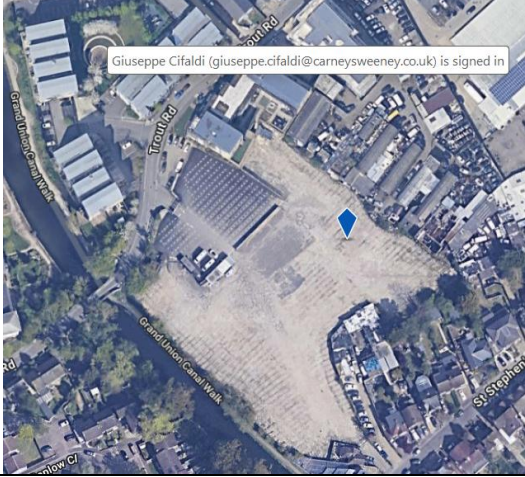


Office unit, Horton Road, West Drayton UB7 8JD Source: Vail Williams			No planning permissions found.	On the market via Vail Williams.	The site measures approximately 1,000 sqm whereas the application site is circa 6111 sqm. The site only comes with 25 car parking spaces	The site is too small for the 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.

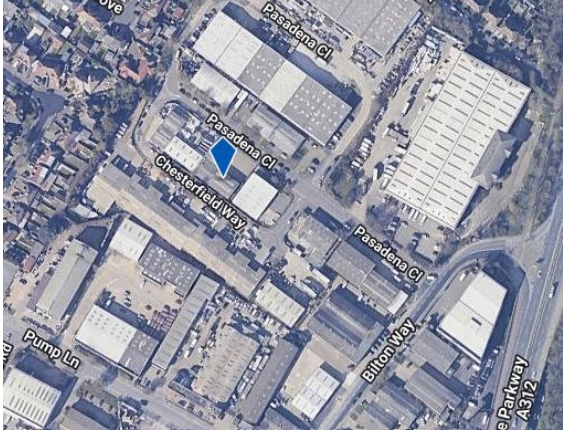


Liddall Way, West Drayton, UB7 8PG			No planning permissions found.	On the market via Telsar	The two units available measure 289 sqm and the application site measures 6111 sqm. The site is located within an existing industrial estate and only comes with 30 car parking spaces	The site is too small and 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.

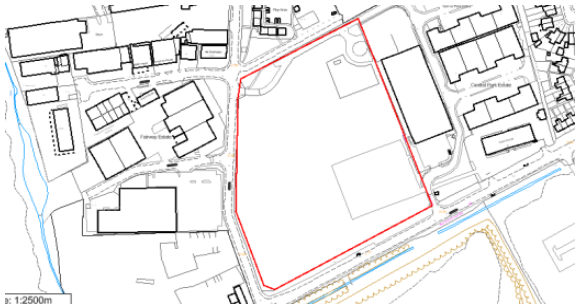


70 High Street,			Permission for change of use from gaming arcade to retail unit. Ref 3862/APP/2009/653	On the market via Movement Estate	The property is the end retail building within an established retail parade. The property measures 278 sqm.	The site is in retail use within an existing retail parade. 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.	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.

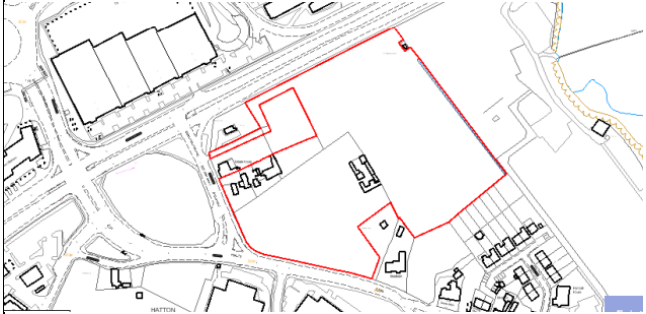


Hounslow Cavalry Barracks		Site is allocated within the Hounslow Regulation 19 Document for residential development of up to 1,000 homes and 3,000 sqm of retail floorspace. It also has 14 listed buildings. Understood planning been granted at the site for 1,525 residential units.	The site appears to be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

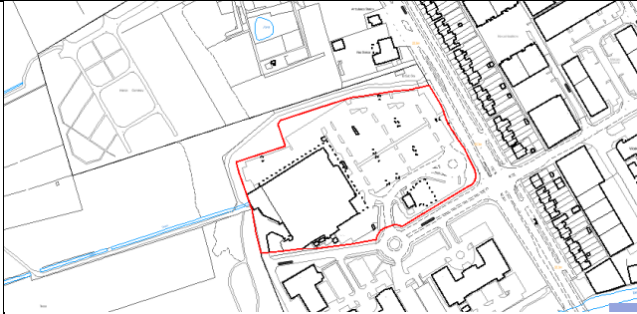


Land at Green Lane		Not aware of any planning permissions. Regulation 19 Document for 10,270 sqm of industrial floorspace.	Our search has not shown the site to be on the open market.	It adjoins the Green Belt and Metropolitan Open Land (MOL) and is partially located within Flood Zone 2	Site has a number 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	The site is currently in Green Belt and proposed to be allocated as LSIS. The current piece of land for sale is an open piece of land which does not contain any buildings. Given the open setting on the green belt, this piece of land would not be suitable for a hotel use.
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	The site is proposed for allocation within the Regulation 19 Document for 5,950 sqm of industrial floorspace to support the borough's emerging employment needs. It is partially located within Flood Zone 2, necessitating a sequential test for flood mitigation. Additionally, the site is set to be re-designated as a Local Strategic Industrial Site. Given these factors, the



					site has been discounted
Tesco Duke Green Avenue		Regulation 19 Document for a new retail superstore, 210 homes. No planning permission apparent.	Our search has not shown the site to be on the open market	Draft allocation, existing superstore.	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.
Land at Hatton Field		Regulation 19 Document for 63,450 sqm of industrial and employment floorspace. No apparent planning permission.	Our search has not shown the site to be on the open market		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



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



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 Shrubby Road & 39-47 High Street, Southall, UB1 3HB		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.



13 – 19 the Green and 10 Merrick Road, UB2 4AU		Regulation 22 Document for a residential-led mixed-use scheme Part of the site has permission for 22 storey mixed use development including 215 flats.	Our search has not shown the site to be on the open market	Allocation is for enhanced office, education and community uses. The site measures approximately 1.06 hectares.	Alongside the proposed allocation uses and the permission, the site would not be large enough to accommodate a new hotel..
Middlesex Business Centre, Bridge Road, Southall, UB2 4AB		Regulation 22 Document for a mixed-use development incorporating residential, health, community, and commercial/retail uses. Planning permission for outline and reserved matters at the site for 867 homes, a hotel, retail floorspace and new east-west link.	Our search has not shown the site to be on the open market	The site is accommodating a number of proposed uses including a hotel. The site is also in Flood Zone 3.	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



The Green, Southall, UB2 4BZ Page 430		Proposed allocation for residential, commercial, employment, and community floorspace. Flood Zone 3 Planning permission obtained (215058FULR3) for uses set out in the allocation	Our search has not shown the site to be on the open market	The site accommodates a number of uses and has planning permission for the allocated uses.	Given these factors, the site is unlikely to become available for hotel development in the short term and has therefore been discounted.
The Straight, Southall, UB1 1QX Page 432		Proposed for allocation for residential, commercial, employment, school, and health centre uses. Flood Zone 3 .Planning permissions have already been granted for the range of uses outlined in the allocation.	Our search has not shown the site to be on the open market	The site is proposed to be allocated and has permission	Given these factors, the site is unlikely to become available for hotel development in the short term and has therefore been discounted.



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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Appendix C – CarneySweeney response to Council’s comments on a number of sites originally identified and a Table of Additional Sites

Appendix C

CarneySweeney response to the Councils comments on a number of sites originally identified

Council comment	Applicant response
4 Tavistock Road was discounted on the grounds of landownership and need for car parking. Planning Practice Guidance clearly states, '<i>land ownership does not provide such a justification.</i>' The site is directly located next to West Drayton station that serves Elizabeth Line trains to Heathrow Airport. It is unlikely the Local Authority would accept high levels of car parking on the site as a result and so this is not a reason for discounting the site.	The site measures approximately 0.05 hectares and cannot reasonably accommodate the scale of development proposed. The Capital Place building alone (excluding the car park) comprises 5,888 sqm of floorspace. Delivering a new hotel of 150 - 200 rooms would therefore necessitate a building of substantial height and density, which would be inappropriate within a context characterised by existing buildings of only three to four storeys that are within the area. There is one building of 5-8 storeys high, however, erecting building of substantial height would significantly harm the amenity of the existing residential use. Although multiple ownerships may not be a formal consideration within the NPPG, the number of individual businesses operating on the site introduces significant complexity. Many may be unwilling or unable to sell their units, further constraining redevelopment potential. This is not a practical point. Additionally, the site is located in close proximity to residential properties to the rear. Increased servicing requirements and associated vehicle movements would likely result in disturbance to these neighbouring homes. The site is wholly unsuitable for the scale and nature of development proposed.
De Burgh Arms was discounted due to the need for demolition of a Listed building. No evidence is provided as to why this would be necessary. The building is currently in use as a hotel and could be refurbished and extended to accommodate more bedrooms. The site	It is wholly unreasonable to expect a hotel of the scale proposed to be accommodated adjacent to the listed building, or to assume that such scale could be achieved through extensions to the existing structure. Delivering development of this magnitude would

is located directly next to West Drayton station.	necessitate substantial extensions or, potentially, demolition of the building, works that would give rise to significant heritage impacts. Furthermore, achieving the required floorspace would inevitably involve adding multiple additional storeys. Such vertical expansion would be entirely inappropriate within the established character and scale of the surrounding area
Old Vinyl Factory was discounted on the grounds it has been fully built out and occupied. This is not the case and therefore a better justification as to why the site would not be suitable for a hotel use should be provided.	Whilst the site may not have been fully built out, it is allocated for residential, has permission for residential and is being occupied as residential. In addition, the local authority cannot meet its 5 year housing land supply position. Therefore, the likelihood that it would be released for a new large hotel in the current climate of an acute housing shortage in London is highly unlikely.
Union House	The site comprises a range of residential units delivered through a prior approval process for office-to-residential conversion. A review of google imagery indicates that these units are now occupied as homes. It is therefore entirely inappropriate and unreasonable to suggest that these properties could be assembled for redevelopment as a hotel. The fact that they are in active residential use fundamentally undermines any realistic prospect of securing the site for such a purpose.
The Common - why was this included if it is not in a town centre. Only town centre sites should be included in the sequential test.	Noted
Hounslow West Station - Site is allocated for residential, retail and leisure so why would it not be suitable for a hotel use? Especially one with gym, spa, restaurant facilities. More justification needed.	The site will need to work hard to accommodate all of the uses identified within the allocation. In addition to these requirements, the site must continue to provide car parking spaces for the train station, alongside the parking, delivery, and servicing needs associated with a

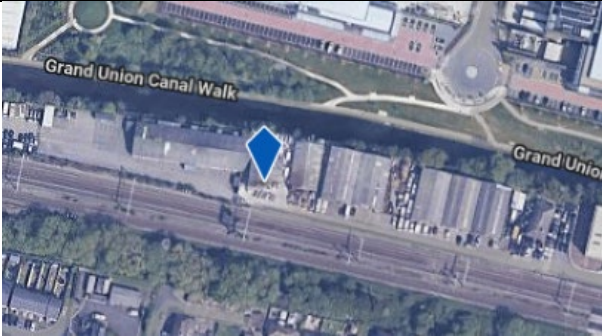
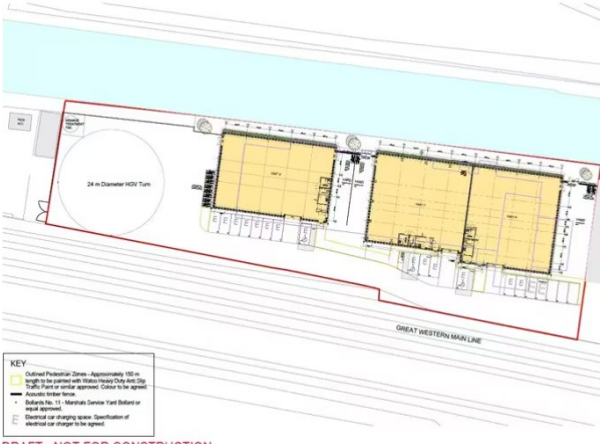
	hotel use. When these operational demands are considered collectively, it is evident that the site does not have the capacity to practically or efficiently accommodate a hotel of the scale envisaged. We have also checked the allocation, and the site is not allocated for leisure. It is allocated for 209 flats and 390 sqm of retail, as such, a hotel use is a departure from policy. Whilst the proposal is for mixed use development, it is clear that the allocation seeks a quantum of specific uses. We do not expect that the Council would support a reduction in the quantum of these uses in favour for a use that is not specified in the allocation. We also note that the Toyoko Inn proposals do not include a hotel with a gym or a spa.
Tesco Duke Av - same question, why would a hotel not complement retail and resi?	The site would need to work hard to accommodate all of the uses identified within the allocation, while also providing the necessary car parking for both the superstore and the proposed hotel. To deliver all of these functions alongside a hotel use, the resulting development would need to be significantly taller and denser than the prevailing built form. Such a scale of development would be wholly inappropriate in an area characterised predominantly by two-storey buildings. There would be conflict between the operation demands for the servicing and deliveries for the store and hotel use.
Southall Crossrail station - Better justification for why a hotel use would not be compatible and why servicing and operational car parking could not be accommodated on a masterplanned site? The site is located directly next to the Crossrail station (PTAL 5) so development should be car-free barring disabled car parking and operational parking. Therefore, car parking provision is not a	The site is going to need to work hard to accommodate all uses and to provide the level of car parking needed to accommodate the new uses and to maintain those for the station car park to continue to operate. Whilst car parking would be car free, a certain level would still be needed for operational needs and servicing which would require some ground floor land take.

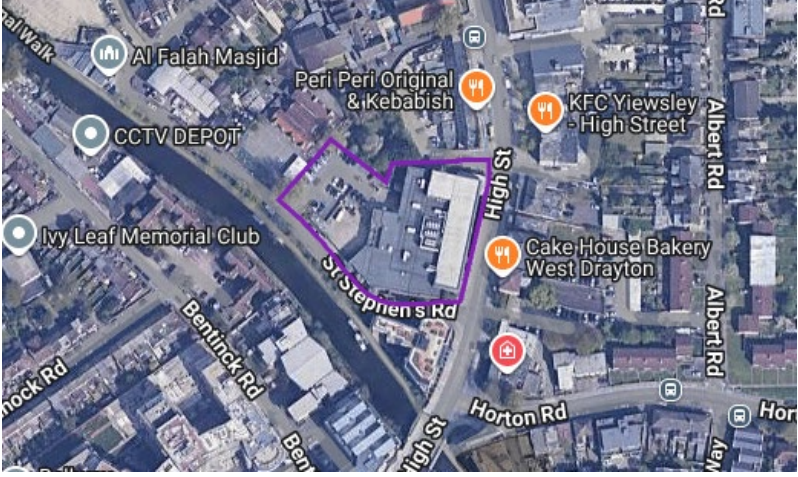
reasonable justification for discounting the site.	A new building would need to be substantially tall and this would not be viable from an urban design perspective.
30 Shrubbery Road - Inadequate justification. What constraints? The site is allocated for mixed-use development and so a hotel use could be acceptable on the site.	The site is allocated for a mix of uses, including office, education, and community functions. The allocation does not support or envisage a hotel use. We acknowledge that, in principle, the Council may have the discretion to support a departure from policy. However, in this case the site's allocation for specific uses carries significant weight in the decision-making process. As these uses have been established through the Local Plan examination and adoption process, we consider that the allocation takes precedence. On this basis, it is unlikely that the Council would support any reduction in the quantum of the allocated uses in favour of an alternative use that is not supported by the allocation. To accommodate a hotel of the scale proposed, the site would need to operate under significant pressure to deliver the required floorspace alongside the existing allocated uses. Furthermore, the site appears to have been built out and is fully occupied. Given that the existing units are in active residential use, it would be neither feasible nor practical to assemble the site for redevelopment as a hotel. The presence of established homes fundamentally limits any realistic prospect of accommodating a hotel on this site.
Endsleigh Estate - As above.	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 industrial uses. As such, a hotel use would be a departure from the policy position.

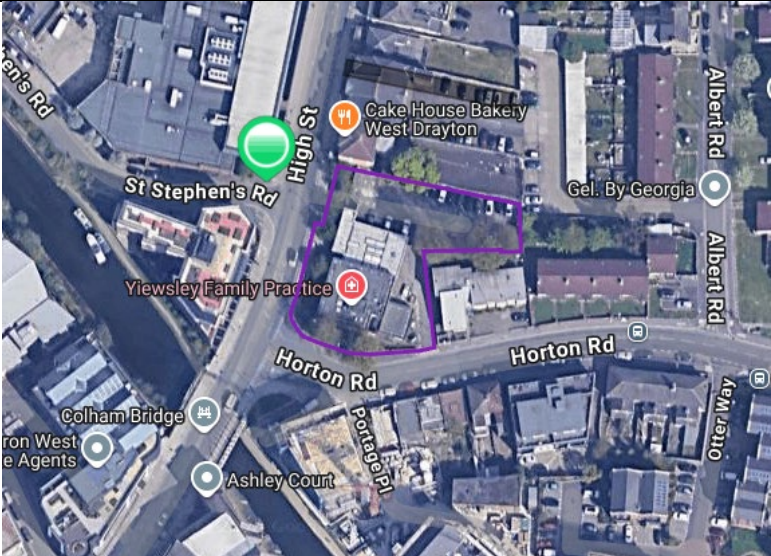
	We acknowledge that, in principle, the Council may have the discretion to support a departure from policy. However, in this case the site's allocation for specific uses carries significant weight in the decision-making process. As these uses have been established through the Local Plan examination and adoption process, we consider that the allocation takes precedence. On this basis, it is unlikely that the Council would support any reduction in the quantum of the allocated uses in favour of an alternative use that is not supported by the allocation. A portion of the site lies within Flood Zone 3 which adds further complexity with the need to preform a Sequential Test and Impact Assessment. Given these constraints the site is not suitable for a hotel.
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Sequential Test – Table of Additional Sites 26.05.26

West Drayton Smaller Sites

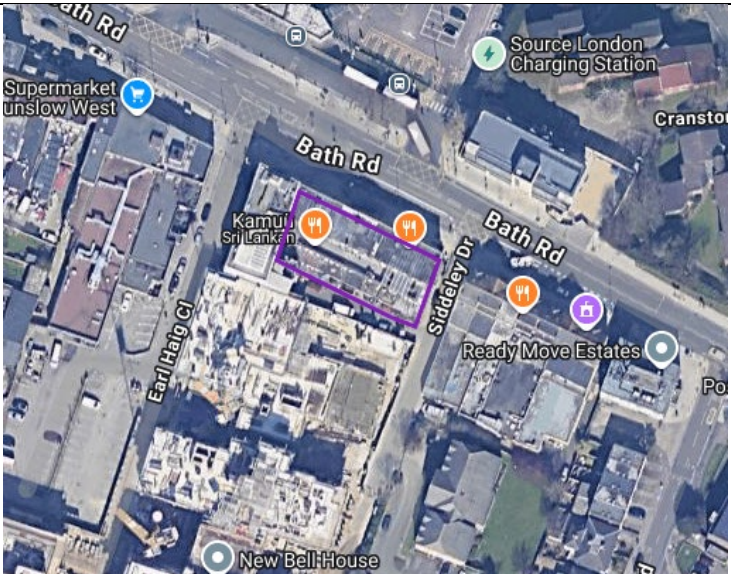
Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
Berrite Estate, Iron Bridge Road LB Hillington	 	No planning permissions found	On the market via GN2	Two units available within the existing industrial unit measuring 852 sqm	In theory, the site could be large enough to accommodate a small number of hotel rooms. However, its location within an existing industrial estate, combined with the constrained layout and the high trip-generating nature of both industrial uses and hotel accommodation, would place significant pressure on the available parking capacity. This site is within a Strategic Industrial Location, as identified in the Local Plan, therefore providing a hotel in this location would represent a departure from planning policy. As a result, this site is discounted.

41 to 67 High Street, Yiewsley, UB7 7QH LB Hillingdon		Ref. e60000213 for phased demolition of the existing buildings and the redevelopment of the site or a replacement foodstore (Class E), 158 residential units (Class C3), car parking, servicing and access arrangements	Identified via Searchland	Site measures 0.52 hectares and is an existing vacant retail store.	The site appears to be of a scale that could feasibly accommodate a hotel. However, a recent planning application has been submitted proposing a foodstore and 158 residential units. Given this, it is unlikely that a hotel development will come forward as part of the current proposal. In particular, Hillington currently has a 2.5-year housing land supply, and as such we do not consider there to be scope to reduce the residential component in favour of a hotel.
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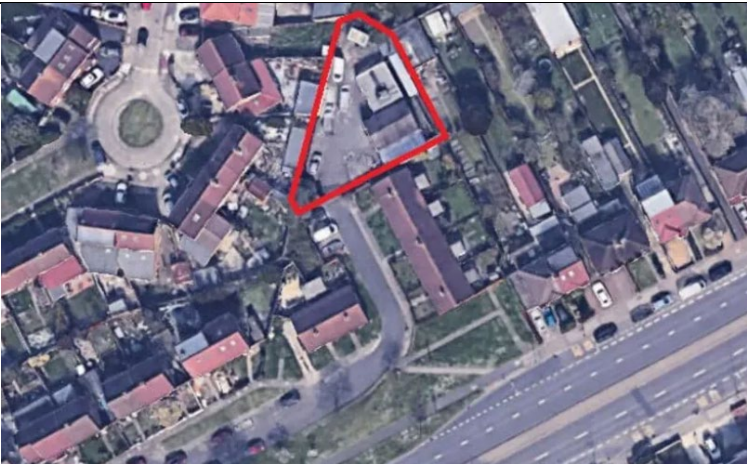
Yiewsley Health Centre, High Street, Yiewsley, West Drayton UB7 7DP) LB Hillingdon		No planning permissions found	Identified via Searchland	Site hectares 0.20 ha and comprises the Yiewsley Health Centre	The site occupies a prominent corner plot and, based on the surrounding built form, could potentially support redevelopment of up to five storeys. While a hotel could theoretically be accommodated, the site is currently in active use as a health centre. Redevelopment for a hotel would therefore necessitate the loss of an established community facility and much needed social infrastructure, which is resisted under Local Plan policy. On this basis, the site is discounted for hotel use, as the proposed change of use would represent a departure from planning policy, which is unacceptable and evidence would need to be provided to confirm that the social infrastructure was no longer required. Given
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					that it is in active use, this position is considered unlikely
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Hounslow West Smaller Sites

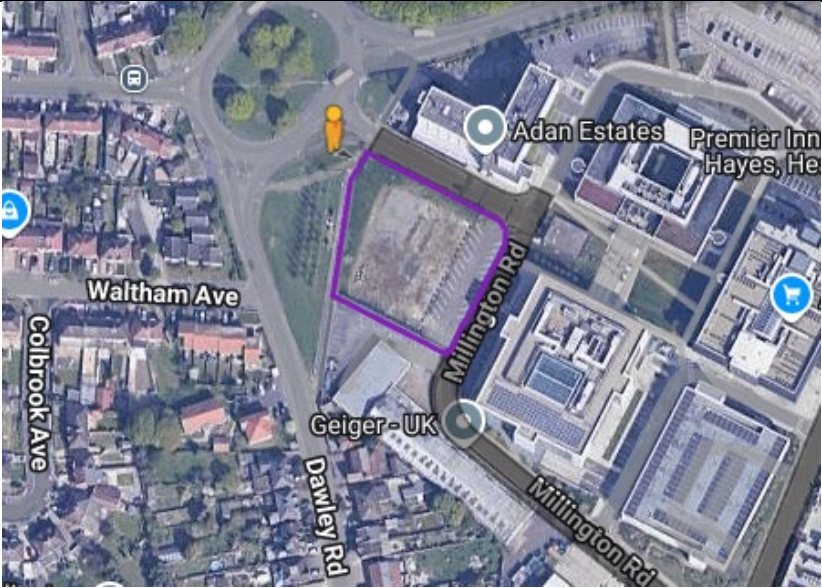
1 to 7 Cavendish Parade, Bath Road, Hounslow LB Hounslow		Planning permissions associated with the retail parade	Identified via searchland	The site measures 0.07 hectares and comprises a range of retail stores which appear to be in operation and residential above. There is also a bus stop located to the front.	The site comprises multiple retail units, each of which is likely to be subject to separate leases. This introduces significant complexity and would require substantial time to negotiate lease terminations. In addition, the residential accommodation above the units would make relocation and reprovision particularly challenging and time-consuming. The bus stop located directly in front of the site would also need to be relocated, adding further complexity. The site itself would be constrained and could only be delivered without on-site parking, including disabled parking
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					provision, which would not be appropriate for hotel use. Whilst it is acknowledged that the site has a PTAL Rating of 5, and so on-site parking should be limited to operational needs, disabled persons parking and parking required for taxis, coaches and deliveries or servicing would be needed to facilitate the development. Due to the location of the site, with no off-site servicing facilities a hotel in this location would likely impede highway safety. In addition, in accordance with the London Plan, at least one disabled bay should be provided. There is no capacity on site for this to be accommodated, thus a hotel proposal would not comply with planning policy and is discounted.
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75 Great South West Road LB Hounslow		No planning permissions found.	Identified by Logik Property	The site measures 0.06 hectares and contains small scale single storey building and parked cars	The site is accessed by a quiet residential street and would not be appropriate for the higher trips associated with the hotel use. The site is surrounded by lower rise properties and would require significant height to accommodate anywhere near 150 bed hotel. The creation of a building in this location with significant height would be out of keeping with the local area, having a detrimental impact on the character of the area, which represents a departure from planning policy. The additional height could also give rise to amenity impacts, which would be unacceptable. Therefore, the site is discounted.

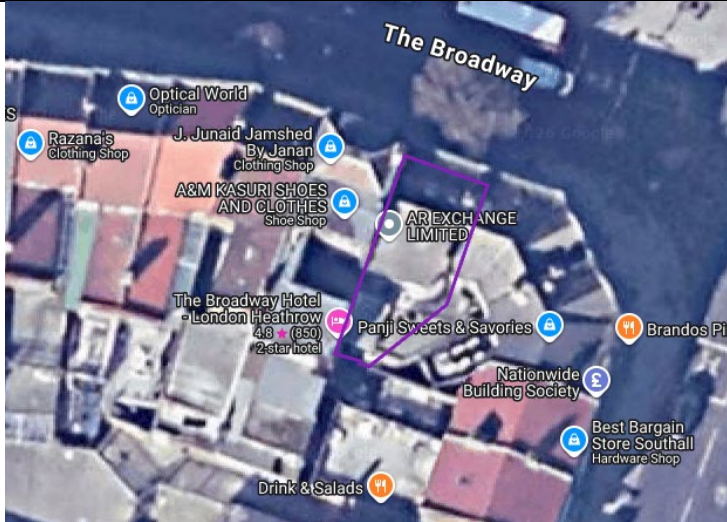
Hayes small sites

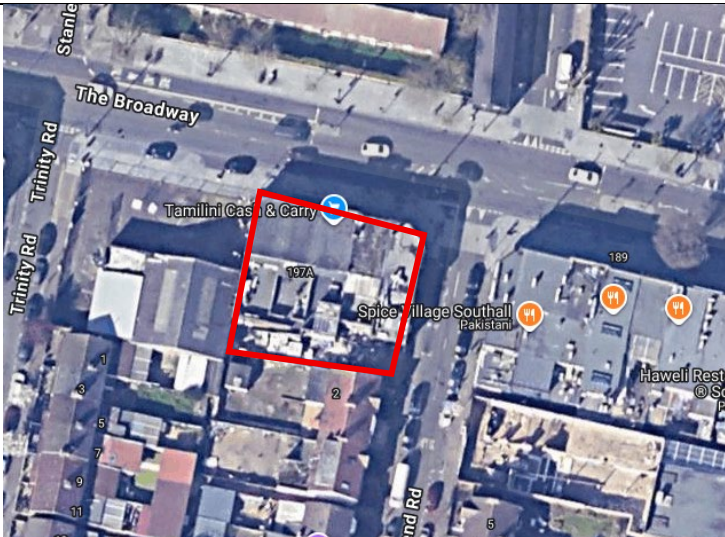
Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
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Land on the north side of Unit 9, Millington Road, Hayes, UB3 4AZ		Variation of Condition 2 (Accordance with Approved Plans) of planning permission ref. 76655/APP/2023/779 dated 26-06-2023 (Variation of Condition 2 ((Re-development of the vacant Site to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, landscaping, car parking and all ancillary and enabling works) to alter the internal layouts and replace 13 no. studio units with 13 no. one-bedroom units), in order to make the following amendments: - Addition of a new external access route to a 2nd core	Identified via searchland	The site measures 0.89 hectares and is an open undeveloped land within a built up area.	The site has recently received planning permission via a s73 for a residential development comprising 131 units. As such, it is not available for a hotel proposal. It is noted that LB Hillingdon are currently only able to demonstrate a 2.5-year supply of housing. Therefore, the provision of a hotel on this site rather than residential development is unlikely to be viewed favourably, and would not address local identified need for housing. A reasonable developer would not seek to acquire this site for a hotel on this basis.
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		(Core B) on 8th floor so that the 4no. top floor flats have access to a second stair core and escape lift; - Insertion of a further escape lift to the southern stair core in Block A from ground to 7th floors; and - Reconfiguration of flats due to internal structural wall changes.			
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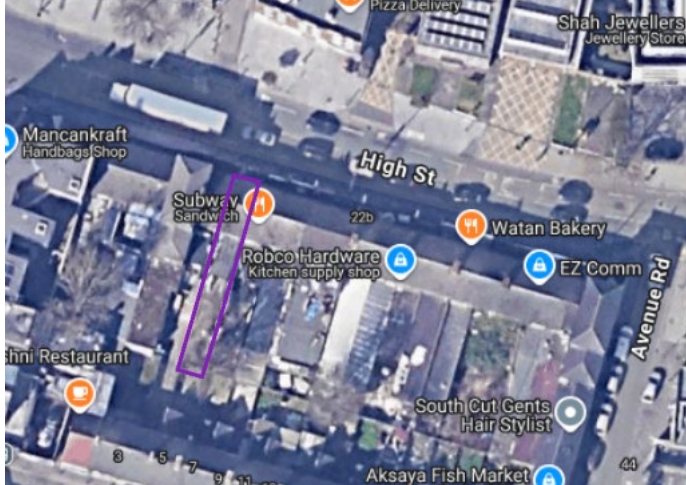
Southall – Smaller Sites

Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
3A The Broadway, Southall, UB1 1JR		260390FUL – Change of use from jewellery shop (use class E) to hot food takeaway (sui generis); alterations to shopfront; installation of service duct to rear elevation. Application Awaiting Determination.	Identified via Rightmove. Ground floor unit on the open market via Galaxy Real Estate Limited, Hayes: https://www.rightmove.co.uk/properties/142880846#/?channel=COM_BUY	The ground floor shop unit is on the open market. The site comprises an existing occupied retail unit that comprises a mid-terrace building on The Broadway within the town centre of Southall.	The site is too small to accommodate a 150-bed hotel. The site on the market is only for a ground floor unit. The site does not have appropriate access to serve a hotel use with no car parking. The site is discounted due to its limited size and access arrangements. Whilst the site is located in the town centre and has a PTAL Rating of 5, thus it is accepted that a hotel development may be car free. Disabled parking is still required in any event, which clearly cannot be provided on this site, and so any proposal would represent a departure from policy in terms of parking requirements. In addition, due to the lack of space available on site, deliveries and servicing would have to

					take place from the main road, which is likely to have detrimental impacts in terms of highway safety.
191 – 197 The Broadway, Southall, UB1 1LX		P/2005/1236 – Mansard roof extension to provide additional storey at second floor level to create 1 x two bed and 4 x one bed self-contained flats; ground and first floor extensions to existing shop and to existing 4 flats at first floor; 2 no. staircase accesses (ground to 1st floor level and 1st to 2nd / mansard level) and external alterations involving installation of new doors and windows. Application	Identified via Zoopla. Site on the open market via Ashford Finance and Property Services: https://www.zoopla.co.uk/for-sale/commercial/details/69151220/?search_identifier=77b665b30c68b4af88e513a48dd24cf16904885cb4b5b62bb8f8fa5ecbeffd24	The site comprises existing retail units on the ground floor with residential units above. The site has an area of approximately 711sqm.	The site is too small to accommodate a 150-bed hotel. A significant increase in height would be required to accommodate a hotel on the site, which would be out of keeping with the street scene and town centre of Southall, where buildings typically comprise two – three storeys. A substantial increase in height would likely represent a departure from planning policy as it would be out of keeping with the local area. Furthermore, significant increase in height is likely to result in unacceptable impacts on residential amenity, particularly noting that there are residential uses directly to the south of the site. Issues such as loss of daylight and sunlight to adjoining

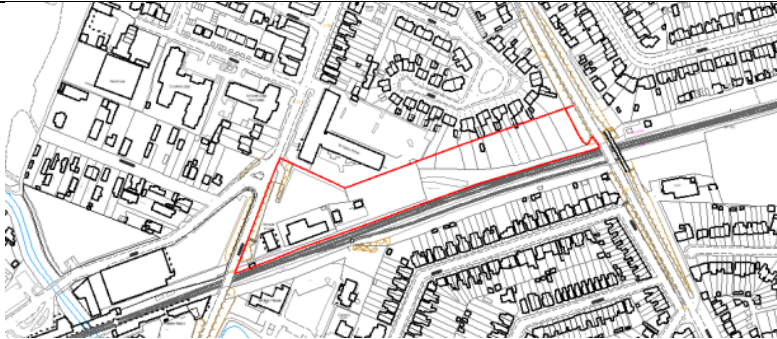
		Refused 14.09.2005.			properties could arise as a result of a taller building. This would be resisted by the Council. A change of use would also result in the loss of the existing residential units, which is unlikely to be viewed favourably by the Council who do not have a 5-year supply of housing. The loss of existing housing stock which is not being replaced, would exacerbate the housing need of the borough. It is evident that this site is not suitable.
65 South Road, Southall, UB1 1SQ		162538FUL - Single storey rear extension to ground floor shop (Use Class A1) following the demolishing of existing rear extensions. Application Approved 10.08.2016.	Identified via Zoopla. Site on the open market by Ashford Finance Property Services: https://www.zoopla.co.uk/for-sale/commercial/details/71631677/?search_identifier=77b665b30c68b4af	The site comprises a two storey building with a small forecourt to the front of the site. It forms part of a pair of semi- detached dwellings which have been converted into retail use. The site has an area of	The site is too small to accommodate a 150-bed hotel. Providing a hotel on this site would require a significant increase in height, which could not feasibly be achieved, noting the property is adjoined to No. 67 South Road. The limited hardstanding to the front of the site also adds an additional complexity, as it would not be possible to

			88e513a48dd24cf16904885cb4b5b62bb8f8fa5ecbeffd24	approximately 417sqm.	provide sufficient car parking to serve a hotel. Whilst it is acknowledged that the site has a PTAL Rating of 4, some disabled car parking is still required on site. The size of this site would not allow for disabled parking to be accommodated alongside access and servicing arrangements without impeding highway safety. Therefore, the use of this site for a hotel would represent a departure from planning policy and guidance on highways and parking grounds. The site is therefore discounted.
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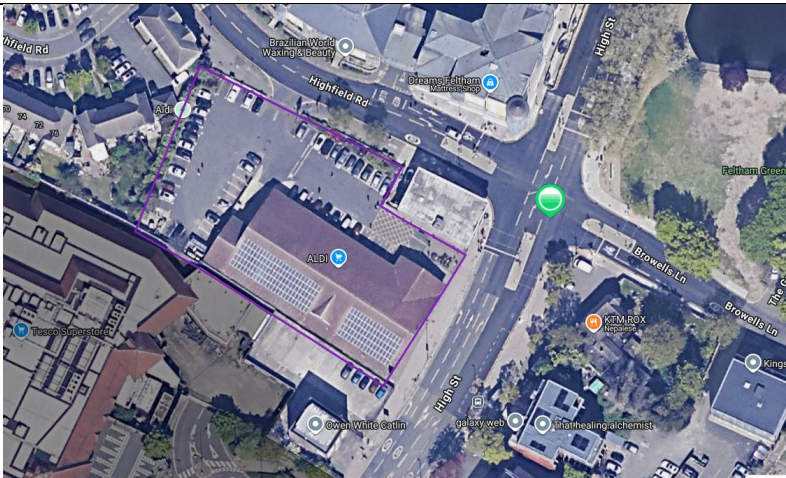
14 High Street, Southall, UB1 3DA		253960FUL – Single storey rear extension with 3 rooflights, first floor rear extension, additional storey with a hipped roof to provide 3 flats on ground, first and second floor levels. Application Awaiting Determination.	Identified via Zoopla. Site on the open market via Galaxy Real Estate: https://www.zoopla.co.uk/for-sale/commercial/details/70799625/?search_identifier=77b665b30c68b4af88e513a48dd24cf16904885cb4b5b62bb8f8fa5ecbeffd24&featured=1&utm_content=featured_listing	The site comprises a single storey building, which is currently occupied by a retail unit. The site has an area of approximately 104sqm. The site does not have any service access or on site parking.	The site is far too small to accommodate a 150-bed hotel. Even with the potential addition of several storeys the plot would not be wide enough to accommodate a functional hotel. Therefore, the site is discounted. The addition of several storeys would be significantly out of keeping with the character of the local area, and would have a detrimental impact on the amenity of neighbours with regards to daylight/sunlight and overshadowing impacts. Therefore, the delivery of the site with a hotel use would clearly be unacceptable in planning policy terms.
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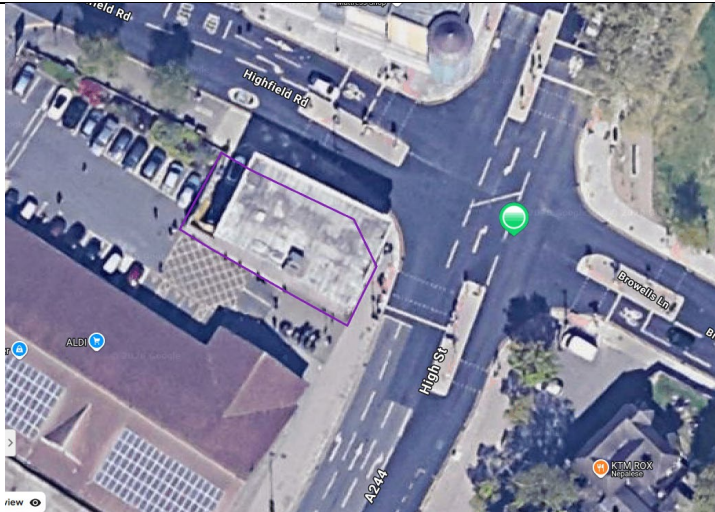
Feltham

There are no allocated sites within the town centre boundary of Feltham.

Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
Network House, Hounslow Road, TW14 9DE		No planning history available.	Proposed site allocation in emerging local plan. Our search has not shown the site to be on the open market.	The site comprises an existing railway signal and maintenance depot, with a site area of 1.5ha. The site is proposed for residential development and is located adjacent to the town centre boundary.	The site is located outside the town centre boundary and is not current available. The site is of significant size and comprises an unusual shape which would not be feasible for a hotel building. Given the size of the site which is significant for a hotel, its location outside the town centre boundary and the proposed residential use, this site is discounted. It is noted that the site is allocated for residential use only. Therefore, the provision of a hotel as part of this application would be contrary to planning policy. A hotel in this location would also represent a departure from planning policy as the site is located outside the town centre,

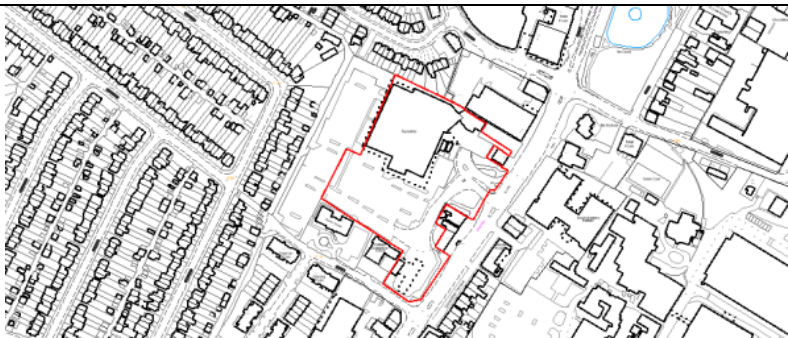
					thus a hotel could have a detrimental impact on the viability and vitality of the adjacent town centre. Whilst the masterplan for Feltham town centre does allow for some hotel use, the Council must be mindful of spillage of such use to other destinations which are outside Hillingdon.
Lidl, New Road, Feltham, TW14 9BG		P/2015/5440 - Demolition of the existing building and erection of a two storey building to provide food store on first floor level with undercroft ground floor parking and associated landscaping. Application Approved 07.04.2017	Proposed site allocation in emerging local plan. Our search has not shown the site to be on the open market.	The site comprises an existing foodstore with associated car park. The site has an area of 7,100sqm and is located within the town centre boundary. The proposed side allocation seeks to redevelop the foodstore to provide a new supermarket combined with new homes as part of the station quarter.	The site is currently occupied by a Lidl store, with the adjoining land used as dedicated customer car parking. As part of Lidl's commercial operating model, we expect it to be essential that their stores are supported by an appropriate level of on-site parking to meet customer demand and ensure the store's continued viability. On this basis, it is our view that Lidl would not be willing to release any portion of the existing car park to facilitate land assembly for a hotel use. From both a commercial and pragmatic

					perspective, the site is therefore not a realistic development opportunity for the proposed hotel, as the required land would not be made available by Lidl.
80 – 86 High Street, Feltham, TW13 4EX		P/2020/3916 – Erection of a part two storey rear extension and external alterations to the store, including shopfront, car park and soft landscaping. Application Approved 26.02.2021. P/2017/0441 – Erection of a single storey rear extension and external alterations to existing store, including alterations to elevational treatment and shopfront, minor alterations to	Identified via Searchland and emerging local plan. Our search has not shown the site to be on the open market.	This site is located within the town centre boundary of Feltham and comprises an existing discount foodstore with associated car parking. The site measures approximately 3,795sqm and comprises a single storey building.	This site is in active use as a foodstore and is not currently available. Therefore, this site is discounted. Policy TC2 of the Local Plan requires the retention of existing retail floorspace. Therefore, the replacement of this foodstore would have a detrimental impact on the retail offer available within the town centre of Feltham, and reduce the amount of retail floorspace within the town centre which would be contrary to planning policy. As such, it is clear that the site would not come forward due to the policy position.

		the carpark and soft landscaping. Application Approved 20.04.2017.			
72 – 74 High Street, Feltham, TW13 4DD		PAC/2025/0529 – Prior approval for the change of use from commercial to residential forming four self-contained residential units. Approved 14.04.2025.	Identified via Searchland and emerging local plan. Our search has not shown the site to be on the open market.	The site is located within the town centre of Feltham. The site has an area of 309sqm. It comprises an existing two-storey building, with two parking spaces.	The site was previously listed for rent by John Fellows in May 2025. However, the property is no longer on the market, thus it is likely no longer available. In any event, the site is of insufficient size to accommodate a 150 room hotel, without significant additional height which would be out of keeping with the local area. Furthermore, the site only benefits from a tandem parking bay which would not adequately accommodate the parking required to serve a hotel use, particularly due to the lack of space to accommodate accessible parking bays. Whilst the town centre location of the site is acknowledged, which has a PTAL Rating of 3,

					the London Plan outlines that parking provision should be assessed on a case-by-case basis and the provision should be consistent with the Healthy Streets Approach. The site is not of a sufficient size to accommodate any accessible parking alongside providing appropriate delivery and servicing arrangements, the proposal would represent a departure from planning policy and result in a detrimental highway impact. Whilst the masterplan for Feltham town centre does allow for some hotel use, the Council must be mindful of spillage of such use to other destinations which are outside Hillingdon. The Hotel Needs Assessment submitted with the planning application confirmed that this displacement is already taking place.
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Land at 2 High Street, Feltham, TW13 4AJ		P/2022/1899 – Demolition of existing building and the erection of a single multi-storey building up to 13 storeys comprising residential units (Class C3) at upper floor levels and commercial, business and service uses at ground floor (Class E) together with associated public realm improvements, landscaping, access arrangements, servicing and refuse and recycling facilities. (The proposed development comprises 74 homes and 155sq.m of commercial floor space). Application	Identified via emerging local plan. Our search has not shown the site to be on the open market.	The site is located within the town centre of Feltham and measures approximately 3,600sqm. It currently comprises retail use with associated car parking and forms a site allocation in the emerging local plan as part of the town centre redevelopment	The site is not currently available and is not actively marketed. The Station Quarter is identified for 1,437 residential apartments, non-residential floorspace of 3,965 sqm accommodating retail, café, restaurant and reprovision of the Lidl store (3,965 sqm) and the re-provided car parking of 205 spaces. It is acknowledged that a hotel could form part of a mixed-use development on this site. However, the masterplan sets out the aforementioned estimated development capacities for the station quarter. Given the estimated development capacities, a hotel at the site would serve to reduce the development capacities of the station quarter. Providing a hotel here would reduce the development capacity other uses, which would
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		Withdrawn 13.12.2023.			undermine the objectives of the town centre masterplan. Whilst the masterplan for Feltham town centre does allow for some hotel use, the Council must be mindful of spillage and spend of such use to other destinations which are outside Hillingdon. This is identified within the Hotel Needs Assessment that was submitted with the planning application.
Tesco, 98 High Street, Feltham, TW13 4EX		No relevant planning history.	Identified as site allocation in emerging local plan. Our search has not shown the site to be on the open market.	The site comprises an foodstore, and has an area of c.17,000sqm. The proposed site allocation is for a mixed-use development for retail and residential uses. The site comprises a large car park with a single storey food store.	A 150-bed hotel could be accommodated on the site. However, this would not align with the plans for the redevelopment of the site in line with the proposed site allocation. Proposing a hotel at the site would jeopardise the delivery of housing which is unlikely to be favoured by the Council due to the pressing need for housing across London. Whilst it is possible that a hotel could be accommodated on the

					site as part of a mixed use development. Achieving a 150-bed hotel would result in a reduction in the number of residential units that could be delivered on site, potentially below the minimum development quantum set out in the allocation which would unlikely be supported by the Council. Furthermore, the delivery of a hotel on this site could also jeopardise the quantum of retail floorspace that could be delivered which would in turn reduce the availability of space for local shops and services which could result in a detrimental impact on the town centre. Whilst the masterplan for Feltham town centre does allow for some hotel use, the Council must be mindful of spillage of such use to other destinations which are outside Hillingdon.
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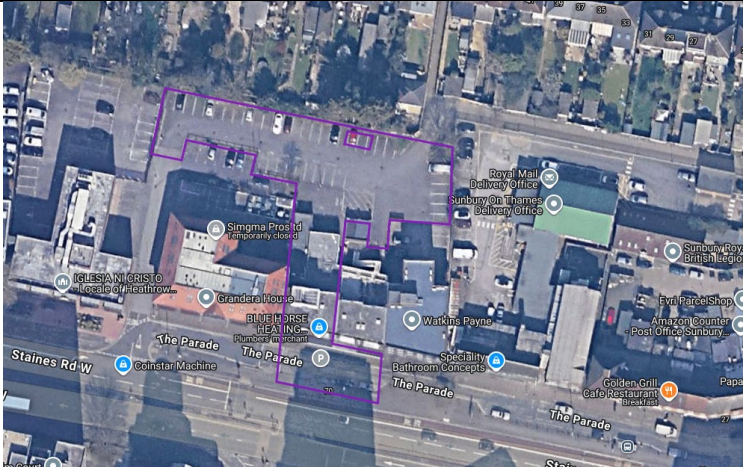
					This was identified in the Hotel Needs Assessment submitted with the planning application. Given that the site is not currently available and for the reasons above, this site is discounted.
Manor Park, Feltham, TW13 4EX		No relevant planning history.	Identified as site allocation in emerging local plan. One unit identified on Orbit Development s: https://www.orbit-development.co.uk/property/manor-park/	The site has an area of approximately 5,550sqm. The site comprises an existing retail park with low rise retail units. There are c. 4 retail units on the site with associated car parking to the front of the site. The site is allocated for a mixed use development comprising residential and retail space.	The site is of sufficient size to accommodate a 150-bed hotel. However, a hotel on this site would not accord with the proposed site allocation. With only one unit currently on the open market for rent, the site as a whole is not available for development. Whilst it is possible that a hotel could be accommodated as part of a mixed-use development on the site, it would require significant height on the site, which could have a detrimental impact on neighbouring amenity, noting that there is existing low rise residential development

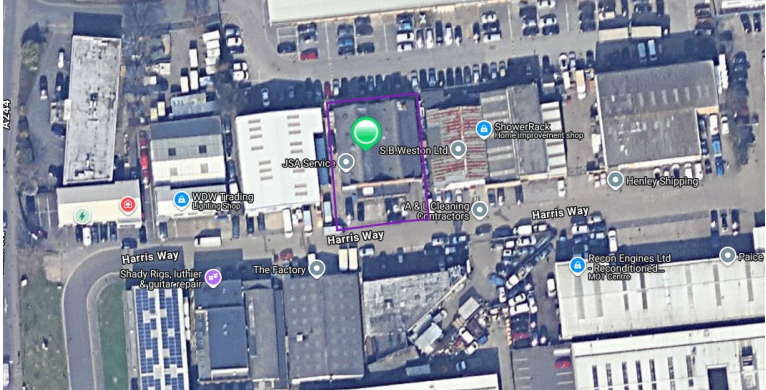
					to the west of the site. A tall building would likely pose an overbearing effect and overshadowing to the adjacent rear gardens which would not be supported. As the proposal would not accord with the site allocation, would require a taller building for delivery, and that the site is not currently on the open market, this site has been discounted.
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Sunbury on Thames

There is no designated town centre within Sunbury on Thames. However, sites within an adjacent to the shopping area boundary and the employment areas have been considered where relevant.

Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
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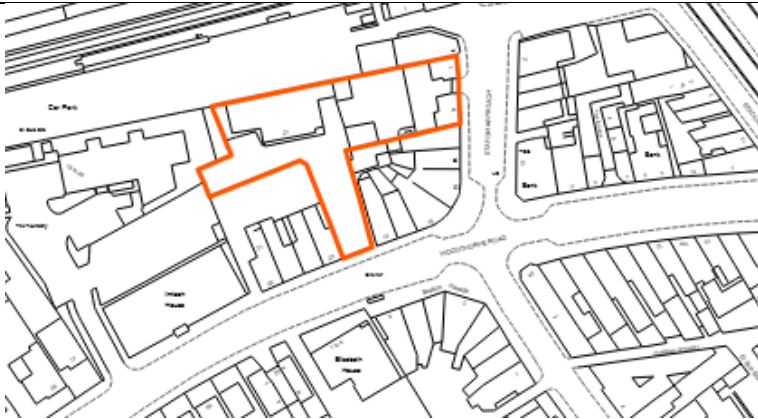
59 Staines Road West, Sunbury-on-Thames TW16 7AG		20/00990/FUL - Proposed change of use of the upper floors to 8 No. residential flats (4x1bed, 4x2bed) including conversion of the existing first and second floor together with roof extension and rear extension. Proposal including new bin store, bicycle store and parking. Application Approved 29.04.2021.	Identified via LoopNet	The site is located adjacent to the primary shopping area and is within a designated employment area. The site measures approximately 2,071sqm and comprises a three storey building. The site is being actively marketed: https://www.loopnet.co.uk/listing/59-staines-rd-w-sunbury-on-thames/37717173/	The site is located adjacent to the primary shopping area in Sunbury on Thames. To accommodate a 150-bed hotel, the site would require a significant increase in height, which would be unacceptable in this location as the site forms part of a wider terrace where building heights range from 3 – 4 storeys. Therefore, a significant increase in height would be out of keeping with the terrace and could not come forward based on design, context and townscape. Given that the site is also located within the employment area, a hotel use would conflict with planning policy and would not comprise an acceptable use for an employment area. This policy conflict would represent an in-principle objection to the use of the site as a hotel.
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123 Harris Way, Sunbury-on-Thames, TW16 7EL		00/00845/FUL – Erection of a 3- storey office building with split level parking and surface parking (Outline). Application Approved 12.03.2001	Identified via LoopNet	The site has an area of approximately 782sqm and is located within an industrial estate within a designated employment area. The site has some allocated parking bays to the front of the building. It comprises a two storey building in a Class B use. The site is being actively marketed by LoopNet: https://www.loopnet.co.uk/listing/123-harris-way-sunbury-on-thames/40313263/	The site is within an allocated employment areas, therefore it is an unsuitable location for a hotel as it could undermine the neighbouring uses and being located in an employment area would reduce the attractiveness of a hotel. Significant height increase would also be required to accommodate a 150-bed hotel, which is not appropriate for this location given the low profile of buildings within the employment area. Given the employment designation, the proposal would represent an departure from planning policy and may result in an agent of change issue. Therefore, the site comprises an unacceptable location for a hotel use, that would be contrary to planning policy and guidance.
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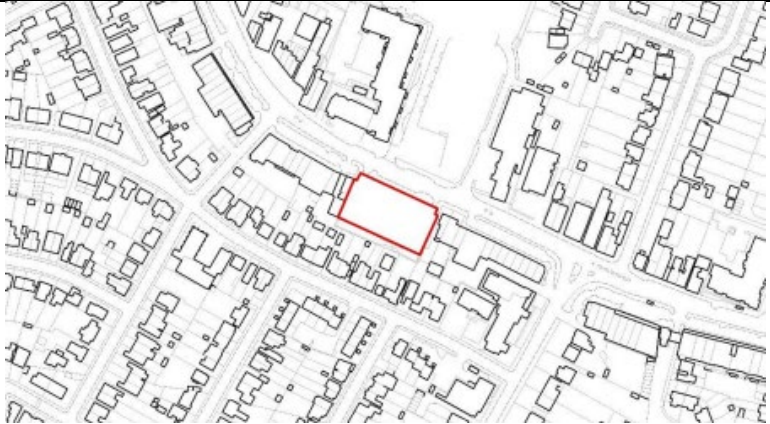
					The site is therefore discounted.
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Ashford

There is no designated town centre within Ashford, therefore sites within the designated shopping area and employment area have been reviewed.

Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
5 – 7 & 9 Station Approach, 21 & 21A, Woodthorpe Road, Ashford, TW15 2RP		25/00663/FUL - Erection of a three-storey building to create 3no. residential units (Use Class C3) and a commercial unit on the ground floor (Use Class E) with associated amenity, refuse, cycle storage and parking. Application Approved 06.08.2025. 24/01089/FUL – Demolition of existing office buildings, and construction of 35 new residential units	Identified via Rightmove Site allocated in the local plan for residential development and Class E floor space.	The site is located with the designed primary shopping area and employment area. The site has an area of approximately 1,611sqm and has an extant permission for residential development and some Class E floorspace. The site is actively marketed by Vokins: https://www.rightmove.co.uk/properties/1694565	The site benefits from a mixed use planning permission. The site is constrained, comprising an awkward shape that would make it challenging to accommodate a hotel use on the site. A proposal on this site would also require significant height, which would be out of keeping with the neighbouring buildings which generally comprise low rise development. Although the site is located within a sustainable location, it is noted that the parking requirements for Spelthorne require one space per bedroom, plus allowance for bars,

		together with Class E (Commercial, Business and Service), associated amenity and parking. Application Approved 09.12.2024.		56#/?channel=COM_BUY	restaurants and other facilities available. This level of car parking could not be accommodated on site. Therefore, a hotel could not be delivered as it would be contrary to planning policy and guidance. Spelthorne are currently unable to demonstrate a 5-year supply of housing. Thus, therefore the removal of the approved residential use on the site in favour of a hotel is unlikely to be viewed favourably by the Council. For the reasons outlined above, this site is discounted.
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Ashford Multi-storey car park, Church Road, Ashford, TW15 2TY		23/00388/FUL – Demolition of Multi-Storey Car Park and erection of a residential block for 42 no. residential units, with associated car parking, together with a further provision of public car parking spaces, and a ground floor commercial use (Use Class E). Provision of landscaping/public realm, access arrangements, and associated highway works. Application Approved 03.04.2025	Identified via local plan site allocation. Our search has not shown the site to be on the open market.	The site comprises an existing multi-storey car park, which sits adjacent to two – three storey buildings. The site measures approximately 2,071sqm.	The site has planning permission for the erection of a residential building. Therefore, the site is not available for hotel development. Whilst the site may be able to accommodate a 150-bed hotel, across a number of storeys, the site is discounted as it is not available and appears to be progressing for residential use. It is noted that Spelthorne District Council is currently unable to demonstrate a 5-year supply of housing. Therefore, the pressing need for housing is likely to outweigh the need for a hotel in this location. As such, the site is discounted. Furthermore, the parking requirements for a hotel could not be achieved alongside the delivery of a 150-bed hotel. Therefore, a hotel on this site would be contrary to
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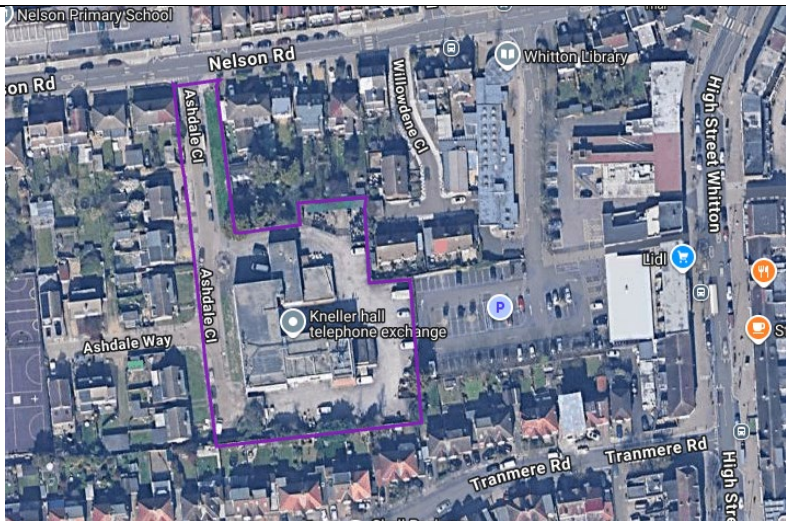
					planning policy, and undermine the aims of providing new housing within sustainable locations. Therefore, due to conflict with planning policy and guidance, this site is discounted.
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Stanwell

There is no town centre or shopping area. Therefore, no further review of this area has been undertaken.

Whitton

Sites within the town centre of Whitton have been reviewed.

Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
Kneller Hall Telephone Exchange		21/0429/FUL - Siting of 2 storage containers within the yard area for a period of 3 years. Application Approved 27.10.2021. 17/3940/FUL - A pole-mounted Omni antenna attached the existing mast at roof level, an	Identified via Searchland and an allocated site.	The site comprises an existing telephone exchange with a long access road and hardstanding around the building providing informal parking. The site has an area of 5,729sqm.	While theoretically a hotel could be accommodated on the site, a number of additional storeys would need to be added to provide a 150-bed hotel. There is limited space for car parking around the building to serve a hotel, and the access road would add another level of complexity for servicing arrangements of a hotel.

		equipment cabinet with attached GPS antenna at ground level and ancillary development comprising cables and cable trays. Application Approved 05.01.2018.		It is an allocated site. The local plan states there is an opportunity for comprehensive redevelopment of the site. It outlines appropriate land uses include employment and social infrastructure or other appropriate town centre use.	Given the additional height that would need to be accommodated and the tight access arrangements this site is discounted. Additionally, the site is not allocated for hotel use. The site has a PTAL rating of 2. In accordance with the London Plan, parking provision for developments in areas with lower public transport accessibility should be assessed on a case-by-case basis. While it may be possible to accommodate the required disabled parking on site, the incorporation of delivery and servicing arrangements alongside any level of general parking would be operationally challenging and is likely to give rise to highway safety concerns. Given the site's PTAL rating, a hotel of this scale would require some on-site car parking to operate effectively. It is evident that such
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					provision cannot be satisfactorily accommodated within the site constraints. In addition, the height necessary to deliver a 150-bed hotel would result in a building of substantial scale. This is likely to generate significant amenity impacts for neighbouring residents, particularly given the predominantly low-rise residential context to the west. Such a scale of development would conflict with the Local Plan's expectations for the area. On this basis, the site has been discounted as a suitable location for the proposed hotel use.
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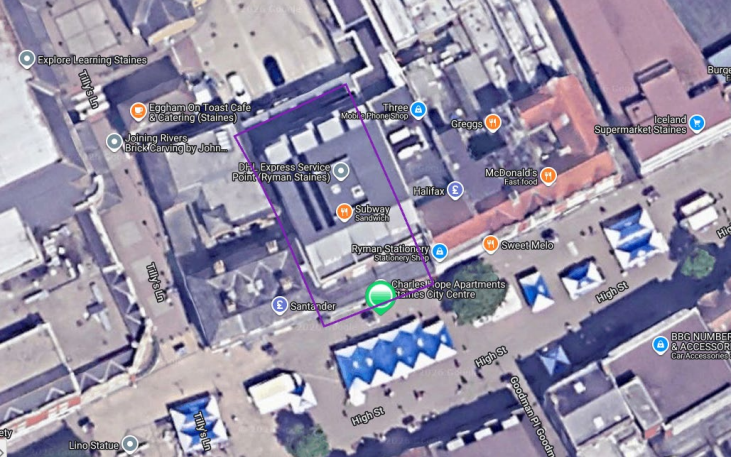
Staines

Sites within the town centre of Staines have been reviewed.

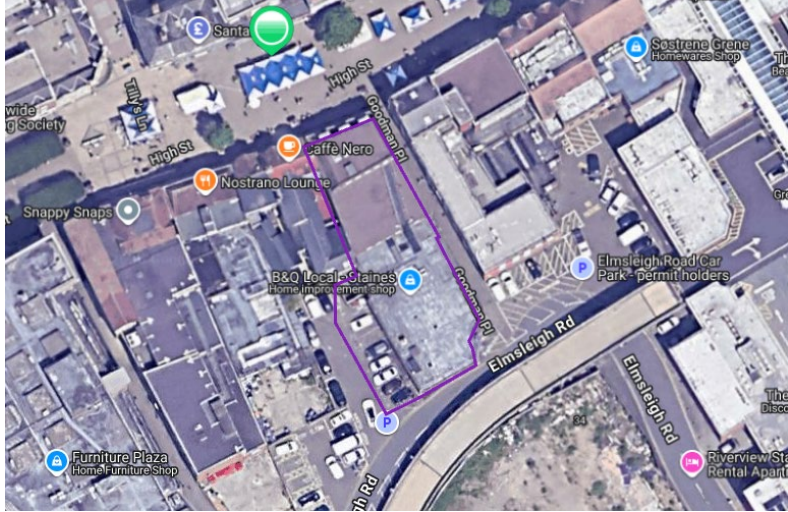
Site Details	Site Location	Planning History	Source	Description	Reason for Discounting
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Birch House/London Road, Fairfield Avenue, Staines, TW18 4AB		26/00396/PAP - Change of Use from Class E (Office) to Class C3 (Residential) for 28 residential dwellings. Approved 11.06.2026. 26/00280/PAP - Change of Use from Class E (Office) to Class C3 (Residential) to form 108 residential dwellings. Approved 03.06.2026 21/01450/FUL - Proposed use of the existing roof terraces on third and fourth floors of the building as amenity space in association with the existing office use along with other associated alterations.	Allocated site in local plan.	Comprises existing retail and office buildings. The site has an area of 1.25ha. The site lies within Staines-upon-Thames. The site allocation outlines the site is for a mixed use development comprising up to 400 residential units, and 1,200sqm of Class E floor space.	The site benefits from planning permission for the provision of c. 130 residential units for the conversion of the existing buildings. The site is not currently being marketed, thus it is not available. Spelthorne is currently unable to demonstrate a 5-year supply of housing. Therefore, it unlikely that the provision of a hotel will be viewed favourably considering the pressing need for housing. In addition, the site allocation does not allow for the provision of a hotel. Therefore, providing a hotel would be contrary to planning policy. Given the above, the site is discounted.
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		Approved 22.10.2021.			
96-104 Church Street, Staines, TW18 4QF		No relevant planning history.	Allocated site in local plan.	The site is located within Staines-upon-Thames and is within the Conservation Area. The site has an area of 0.88ha. The site is allocated for up to 100 residential units (Class C3). The site is at risk of surface water flooding and partially located within flood zones 2 and 3.	Whilst the site may have the physical capacity to accommodate a 150-bed hotel, it is allocated solely for residential development. Given that the Council is currently unable to demonstrate a five-year housing land supply, and in light of the site's allocation, the prospect of it being released for a large hotel scheme is extremely limited. In the context of an acute housing shortage within the Borough and the wider London area, it is highly unlikely that the Council would support the loss of an allocated housing site for a non-residential use of this scale. The site has therefore been discounted as a realistic option for the proposed hotel.

50, 52, 54 High Street, Staines		16/01979/FUL - Erection of a roof extension to create three residential flats (NOTE AMENDED PROPOSAL). Appeal Allowed 17.09.2028.	Identified via LoopNet: https://www. oopnet.co.uk /listing/50525 4-high-street- staines/3227 4088/ (accessed 19.06.2026)	The site has an area of 0.04ha. It is located within Staines- upon-Thames. The existing site comprises retail use at the ground floor with ancillary space/residentia l use above.	The site is far too small to accommodate a 150-bed hotel. A building of significant height would be required to achieve the necessary quantum of development. A significant increase in height would be out of keeping with the surrounding area, and would result in a detrimental impact on amenity of neighbours and the character of the area. In addition, whilst the site is located within an accessible location in the town centre. A hotel use would still require some car parking in accordance with the Spelthorne Planning Guidance. The constraints of the site would also create issues in terms of servicing and delivery. Therefore, the site is discounted.
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37 – 45 High Street Staines		21/30021/SMI - Demolition of the former Debenhams Store and redevelopment of site to provide 226 dwellings (Use Class C3) and commercial units (Use Class E) together with car and cycle parking, hard and soft landscaping, amenity space and other associated infrastructure and works.	Identified via LoopNet: https://www.loopnet.co.uk/listing/505254-high-street-staines/32274088/ (accessed 19.06.2026) Allocated site in the local plan.	The site is allocated for a mixed use development including up to 150 residential units and 500sqm of commercial (Class E) floorspace. The site is located within the primary shopping area. The existing building is locally listed.	The provision of a hotel in this location would be contrary to the site allocation for residential and Class E use. Whilst the site may be capable of accommodating a hotel, this would require a reduction in the number of residential units and commercial floorspace that could be provided. Given that the Council are currently unable to demonstrate a 5-year supply of housing, a reduction in the number of residential units is unlikely to be viewed favourably by the Council. The local listing of the building also adds a further complexity. The site is discounted for the above reasons.
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61 – 63 High Street, Staines		18/01749/PDO - Prior approval notification for the change of use of the first and second floor from office (B1) to residential (C3) comprising 5 no. flats. Approved 12.02.2019.	Identified via LoopNet: https://www. oopnet.co.uk /listing/61- 63-high-st- staines/3783 5428/ (accessed 19.06.2026)	The site is located within the town centre and primary shopping frontage. The site has an area of 0.09ha.	The site is too small to accommodate a 150-bed hotel. A building of significant height would be required to enable the quantum of development proposed. The increase in height required to deliver the hotel would appear overbearing and out of keeping with the street scene, having a detrimental impact on the character of the area, which would not be supported from a design and townscape perspective. The site also comprises existing residential units on the upper floors, which would be lost as a result of a hotel development. Therefore, given the Council's pressing housing need, the loss of residential use for a hotel development is unlikely to be viewed favourably by the Council. For the above reasons, this site is discounted.
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Frankie & Benny's/Tr avelodge, Two Rivers, Hale Street, Staines, TW18 4UW			No relevant planning history.	Allocated site in the local plan.	The site is located within Staines Town Centre and is allocated for residential development, delivering up to 55 units. The site has an area of 0.24ha. The site is currently occupied by a restaurant and hotel use. The site is located within the Staines Conservation Area.	The site is allocated for residential development only. Therefore, the reprovion of a hotel on this site would be a departure from planning policy which is unlikely to be viewed favourably by the Council. A hotel use would require strong justification to override the adopted residential allocation. The location of the site within the conservation area adds a further complexity to the proposal. The site is not currently on the market. For the above reasons, this site is discounted.
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Communications House, South Street, Staines, TW18 4QE			No relevant planning history.	Allocated site in the local plan.	The site is allocated for residential development, delivering up to 120 residential units. The site has an area of 0.25ha. The existing building is current in office use and is part six part five storeys. The site is within Staines Town Centre.	The site is allocated for residential development only. The provision of a hotel on this site would be a departure from planning policy and is unlikely to be viewed favourably by the Council given the pressing need for housing within the Borough and London. The location of the site within the conservation area adds a further complexity, as achieving additional density at the site would be difficult to secure., The site is not on the market and is not currently available. The site is therefore discounted.
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William Hill / Vodafone/ Monsoon, 91-93 High Street, Staines TW18 4PQ		No relevant planning history.	Allocated site in the local plan.	The site is allocated for residential development of up to 14 units and commercial (Class E) development of c.400 sqm retaining the existing floor space. The site has an area of 0.11 ha. The building is locally listed.	The site too small to accommodate a 150-bed hotel. Significant height would be required to achieve the necessary quantum of development, which would have a detrimental impact on the character of the area. The provision of a hotel would also be contrary to the site allocation. Given the pressing need for housing, this is unlikely to be viewed favourably by the Council. In addition, due to the location of the site, parking and servicing would not be suitable to serve a hotel use. Whilst the site is located in a sustainable location, disabled car parking would be required in any location and this could not be achieved on site. Therefore, the site is discounted.
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Thameside House, South Street, Staines, TW18 4PR			20/00344/FUL - Demolition of existing office block and erection of 105 residential units in two buildings, with flexible commercial and retail space, associated landscaping, parking and ancillary facilities. Application Withdrawn 16.11.2023.	Allocated site in the local plan.	The site is allocated for a mixed use development, including up to 140 residential units and flexible commercial (Class E) floorspace up to 3,200sqm. The site has an area of 1.26ha. The site is located on the edge of the town centre. The site is partially located within Flood Zone 3.	The site is allocated for a mixed use development, which does not include hotel use. Whilst the site may be capable of accommodating a hotel use, this is unlikely to be viewed favourably where it would result in the provision of less housing, particularly where the Council is unable to demonstrate sufficient housing supply. The site is not currently on the market, thus it is not considered available. Furthermore, the location of the site within flood zone 3 adds a further complexity. For the above reasons, this site is discounted.
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34-36 Kingston Road (Oast House) & Car Park, Staines, TW18 4LN		23/00098/FUL - Proposed mixed use development for new NHS Health and Wellbeing Centre, 184 residential flats, workspace and refurbishment of the Oast House to provide community / arts / workspace use with potential for café and theatre, and servicing and landscaping / amenity provision, together with associated parking, with disabled parking and drop off space only on site, and a decked parking solution on the Elmsleigh Centre surface car park. Application	Allocated site in the local plan.	The site is allocated for a mixed use development comprising up to 180 residential units and 4,500sqm of community/healthcare use. The site has an area of 0.92ha. The site currently comprises a mix of uses including Surrey County Council buildings, a car park and private buildings.	The site is allocated for healthcare and residential development. The provision of a hotel would not accord with the aims of the site allocation and would represent a departure from planning policy which would be resisted. The site is not currently on the market and is not available. Therefore, this site is discounted.
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		withdrawn 16.11.2023.			
Builders Yard, Gresham Road, Staines, TW18 2BE		25/01498/PAP - Prior approval notification for the demolition of the buildings (As shown on drawing no's: 2025-0805 001; 2025-0805 002; 2025-0805 005 received 16.12.2025). Approved 13.01.2026. 26/00274/FUL - Construction of a dropped kerb and modifications to the pavement to facilitate vehicular access to the plot of land following demolition of the buildings. Approved 12.05.2026.	Allocated site in the local plan.	The site is allocated for a residential development for c.343 units. The site has an area of 1.36ha. The site comprises an existing builders yard and is on the periphery of the town centre.	Whilst the site may be capable of accommodating a 150-bed hotel. The site is allocated for residential development only. Therefore, the provision of a hotel on this site would be contrary to planning policy. Given the pressing need for housing, and the Council's inability to demonstrate a 5-year supply of homes, the provision of a hotel in lieu of residential development is unlikely to be viewed favourably by the Council. The site is not currently on the market, and is not considered available. Therefore, this site is discounted.

Elmsleigh Centre and Adjoining Land, South Street, Staines, TW18 4QF		No relevant planning history.	Allocated site in the local plan.	The site is allocated for a mixed use development for up to 850 residential units and retail/commercial town centre uses (Class E) The site has an area of 5.5ha. The site is within the town centre and primary shopping area.	Whilst the site has capacity to accommodate a hotel, this site allocation does not allow for a hotel. Despite this, it is accepted that the Council may support a hotel as part of the retail and commercial town centre use of the allocation. Notwithstanding the potential for such a development to accommodate a hotel, this use would likely have to come forward as part of the wider site allocation. The site is within the site allocations for Years 11 – 16 (2034 – 2039/40). Therefore, the site is not considered currently available, nor is the site on the open market. In addition to the above, it is noted that the Council must be mindful of spillage of hotel floorspace to other areas, outside of Hillingdon.
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					For these reasons, this site is discounted.
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