

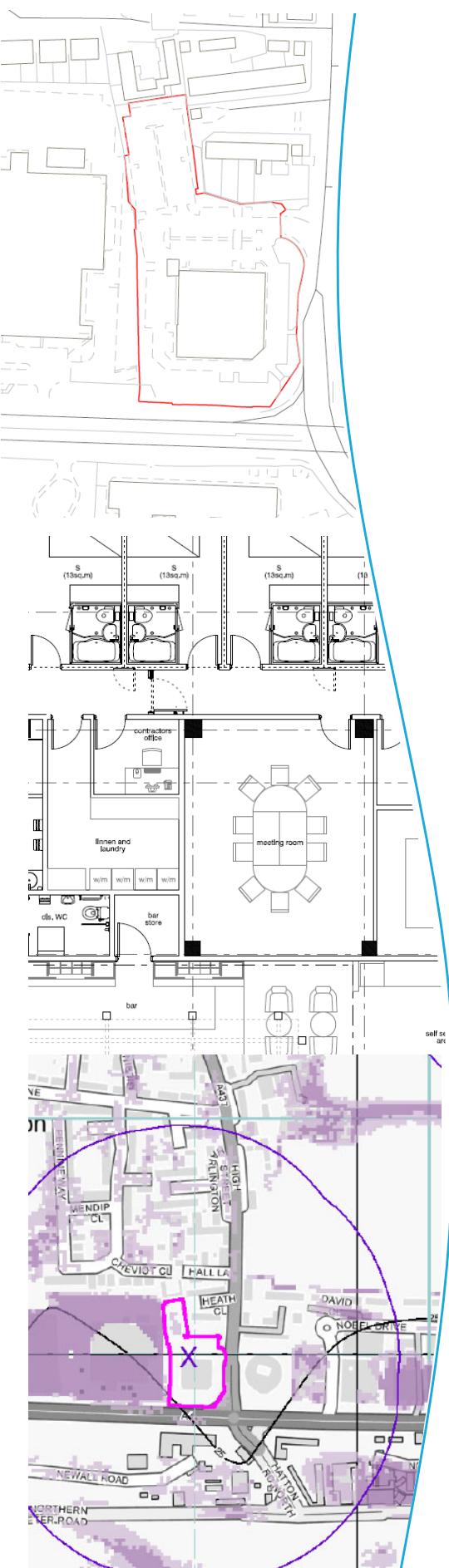
Project\_  
**Capital Place**  
**120 Bath Road, Harlington, Hayes**

Title\_  
**Flood Risk Assessment and  
Surface Water Management  
Statement**

Project No\_  
**1236**

Date\_  
**December 2025**

Revision\_  
**B**



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This flood risk assessment has been prepared in accordance with the NPPF, Local Planning Policies and the NPPG. Any recommendations regarding levels are based on the relevant British Standards, the standing advice provided by the EA, or based on common practice.

Flo Consult UK Ltd do not warrant that the advice in this report will guarantee the availability of flood insurance either now or in the future.

Author	Date	Revision
Mark Symonds	3 <sup>rd</sup> December 2025	A
Mark Symonds	12 <sup>th</sup> December 2025	B

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## 1. Introduction

This flood risk assessment and surface water management statement has been prepared by Flo Consult UK Ltd, on behalf of Toyoko Inn Co. Ltd, for a change of use of an existing building Class E (office) to Class C1 (hotel) at Capital Place, 120 Bath Rd, Harlington, Hayes, UB3 5AN.

This report provides a detailed overview of the proposed development and an assessment of it in relation to the flood risk, and how the proposals have been developed in relation to current flood map data and current planning policy and requirements, including:

- National Planning Policy Framework (NPPF), December 2024 (as amended February 2025), Paragraphs 161-163 and 170-182;
- National Planning Practice Guidance (NPPG) ('Flood Risk and Coastal Change' section), released in March 2014 and updated in August 2022;
- Environment Agency and Department for Environment, Food and Rural Affairs guidance;
- Environment Agency and JBA Consulting via Landmark Envirocheck data Service.

And local policies including:

- The London Plan (2021) Policy SI 12 (Flood Risk Management) and SI 13 (Sustainable Drainage);
- West London Strategic Flood Risk Assessment (2008);
- London Borough of Hillingdon Preliminary Flood Risk Assessment (May 2011);
- London Borough of Hillingdon Local Planning Policy LPP1 (2012) Policy EM6;

London Borough of Hillingdon Council needs to be satisfied that the proposed development design principles will address the risk of flooding to the Site, and that the proposals will not in turn increase the risk of flooding to neighbouring land and property.

This Flood Risk Assessment (FRA) has therefore been prepared to identify and evaluate the various possible sources of flood risk, to which the Site might be subjected to, and identify any mitigation; protection; or compensation measures deemed necessary or feasible, including design requirements to promote the use of sustainable drainage systems (SuDS).

## 2. National and Local Guidance and Policies

### 2.1. National Planning Policy Framework (NPPF) and National Planning Practice Guidance

The NPPF December 2024 (as amended February 2025) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. This document is used to form this surface water management report, with particular attention to Paragraphs 161-163 (Planning for Climate Change) and 170-182 (Planning and Flood Risk).

NPPF Paragraphs 170-182 provide guidance for planning and flood risk, where plans should apply a sequential, risk-based approach to the location of development taking into account current and future impacts of climate change; to ensure that flood risk is not increased elsewhere due to the development; and to incorporate sustainable drainage systems.

NPPG, Paragraph 020 (Reference ID: 7-020-20220825), outlines that the objectives of this FRA are to establish whether a proposed development is likely to be affected by current or future flooding from any source; whether it will increase flood risk elsewhere; whether the measures proposed to deal with these effects and risks are appropriate; whether there is evidence for the local planning authority to apply (if necessary) the Sequential Test; and whether the development will be safe and pass the Exception Test, if applicable.

### 2.2. Flood and Water Management Act

The Flood and Water Management Act takes forward some of the proposals from three previous strategy documents published by the UK Government - Future Water (2008), Making Space for Water (2008) and the UK Government's response to the Sir Michael Pitt's Review of the summer 2007 floods. In doing so it gives the EA a strategic overview role for flood risk, and gives local authorities responsibility for preparing and putting in place strategies for managing flood risk from groundwater, surface water and ordinary watercourses in their areas

### 2.3. London Borough of Hillingdon Local Planning Policy EM6: Flood Risk Management

*The Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the NPPF.*

*The subsequent Hillingdon Local Plan: Part 2 -Site Specific Allocations LDD will be subjected to the Sequential Test in accordance with the NPPF. Sites will only be allocated within Flood Zones 2 or 3 where there are overriding issues that outweigh flood risk. In these instances, policy criteria will be set requiring future applicants of these sites to demonstrate that flood risk can be suitably mitigated.*

*The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. The Council will encourage SUDS to be linked to water efficiency methods. The Council may require developer contributions to guarantee the long term maintenance and performance of SUDS is to an appropriate standard.*

### 3. Site Setting and Description

#### 3.1. Site Location

The Site is in a residential and commercial area of Harlington, is approximately 200m north of Heathrow Airport, approximately 1.5km north of Hatton Cross station, and as shown on the Site location plan in Appendix A, is bound by residential dwellings leading to Heath Close and Hall Lane to the north, High Street Harlington to the east, Bath Road to the south, and a hotel to the west.

The postcode at the Site is UB3 5AN, with the co-ordinates being: Easting: 508770, Northing: 176970.

#### 3.2. Existing Site

As detailed on the plans in Appendix B, the Site, in a pre-development state, consists of an office building (Use Class E) to the centre, with parking and access around the perimeter, further parking to the north, and landscaping with trees around the boundaries.

#### 3.3. Proposed Development

The proposed site plans are shown in Appendix C. The proposed development includes the change of use of the existing building from Class E (office) to Class C1 (hotel), with infill extension, together with ancillary hotel facilities, car parking, drop-off and servicing arrangements, and associated landscaping.

In relation to flood risk and surface water management, the main entrance to the hotel will be to the east of the building, the building extent will remain as existing, and external works will not affect current surface water networks, discharge rates / volumes, or discharge destination.

#### 3.4. Topography

In terms of topography, the Site is relatively flat with localised falls in external areas to gullies and channel drains (refer to Appendix B for survey level details).

The entrance / exist thresholds to the existing building are 25.04m AOD, with the finished ground floor level of the building being higher at **25.53m AOD**.

Low points of the Site are to the north where the levels fall to **24.70m AOD**, to the west of the Site where the levels fall to 24.81m AOD, with the high points being to the east of the Site, where the levels rise to 25.02m AOD.

#### 3.5. Waterbody / Rivers / Artificial Sources

There are no known waterbodies near the Site, with the nearest being the Duke of Northumberland's River, the River Colne and Wraysbury River approximately 3 km to the west.

#### 3.6. Public Sewers and Existing Drainage

It is believed that the nearest sewer networks to the Site are in High Street Harlington to the east and Bath Road to the south.

Topographical survey plans show a series of rainwater pipes, gullies, channel drains and manhole covers within the car park and access areas of the Site. Therefore, it is believed that there are existing drainage networks within the Site that take the surface water run-off from the building and external hard-standing areas, and discharges to the sewers within the roads.

#### 3.7. Ground Conditions

The ground conditions for the Site can be determined via the British Geological Survey (BGS) website, where it shows the ground to have Superficial Deposits of Langley Silt Member (clay and silt), over bedrock consisting of London Clay Formation (**clay**).

## 4. Sources of Flooding

In accordance with the NPPF, flood risk must be assessed for all sources of flooding. All possible sources of flooding, and a brief description of each, are as follows:

### 4.1. Fluvial Flooding

Fluvial flooding results from watercourses / rivers surcharging and flooding the surrounding areas.

### 4.2. Coastal Flooding

Coastal flooding results from high tides from the sea.

### 4.3. Pluvial Flooding

'Pluvial' flooding is that which results from rainfall generated overland flow before the run-off enters any watercourse, drain or sewer. It is more often linked to high intensity rainfall events (typically in excess of 30mm per hour). However, it can also result from lower intensity rainfall or melting snow where the ground is saturated, frozen, developed or has low permeability. This results in overland flow and ponding in depressions in the topography. In urban areas 'pluvial' flows are likely to follow the routes of highways and other surface connectivity to low spots where flooding can occur. In some cases, it can deviate from this route into adjacent developments via dropped kerbs (either for access to driveways or disability access).

### 4.4. Groundwater Flooding

Groundwater flooding is caused by the emergence of water from sub-surface permeable strata. Fluctuations in the groundwater table can cause flooding should the table rise above the existing ground level. Groundwater flooding events tend to have long durations, lasting days or weeks.

### 4.5. Flooding from Drains and Sewers

Flooding from drains and sewers is caused when the capacity of the drains and sewers is exceeded, and will result in flooding from the manholes.

### 4.6. Canals, Reservoirs and Other Artificial Sources

Flooding from canals, reservoirs and artificial sources is caused when the capacity of the sources is exceeded, or if there is an infrastructure failure.

## 5. Sourced Data

Data from the Environment Agency and local authority strategic flood risk assessment are to be studied to establish which sources of flooding are at the site.

### 5.1. Environment Agency Flood Maps for Planning

The Environment Agency (EA) present day fluvial flood zone map shown in Figure 1 indicates that all the Site is in Present Day Flood Zone 1.

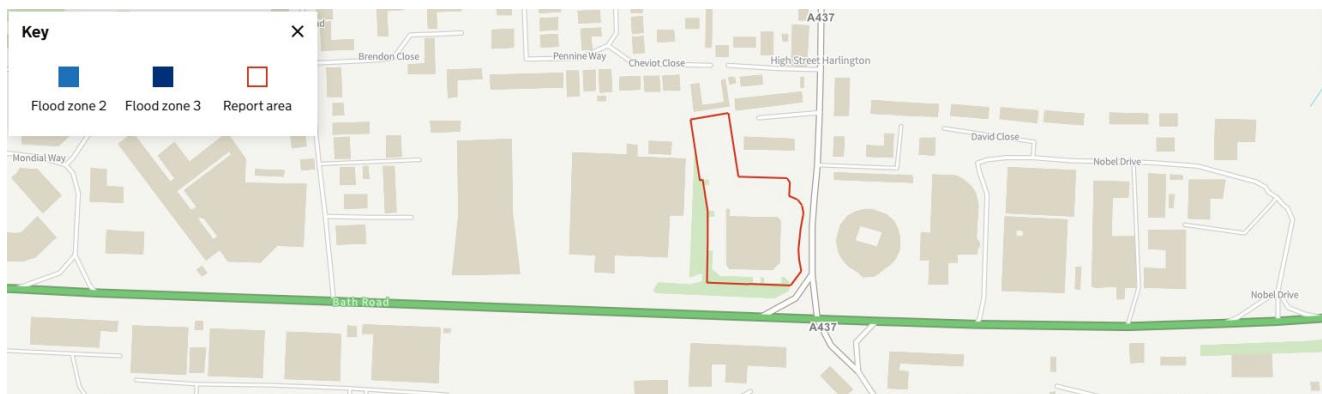


Figure 1 – EA Present Day Fluvial Flood Zone Map

The EA future climate change (2070 to 2125) fluvial flood extent map shown in Figure 2 indicates that all the Site is outside the Future Climate Change Flood Extents.

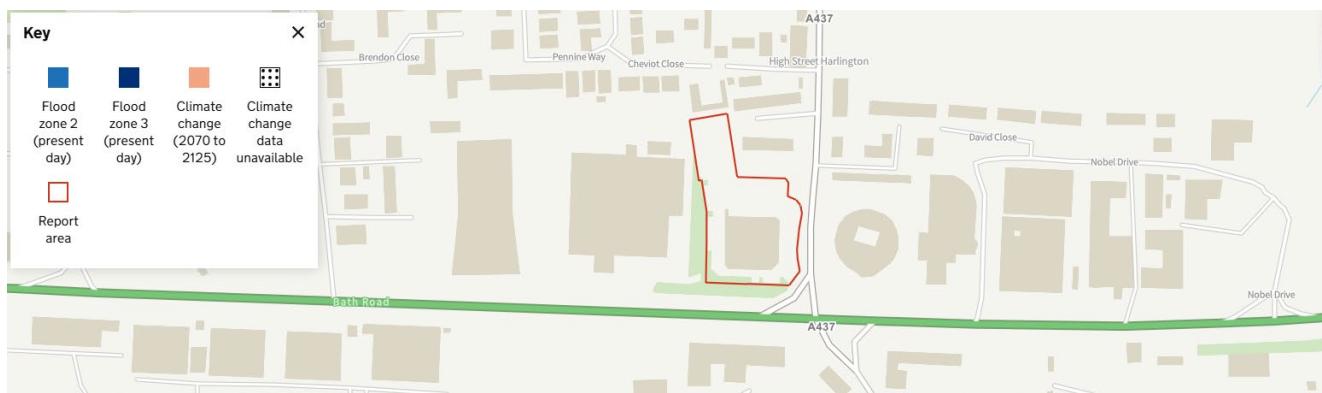


Figure 2 – EA Future Climate Change (2070 – 2125) Fluvial Flood Extent Map

The EA surface water flood extents map shown in Figure 3 indicates that the Site is outside surface water flood extent area in the 1 in 30 annual likelihood event.

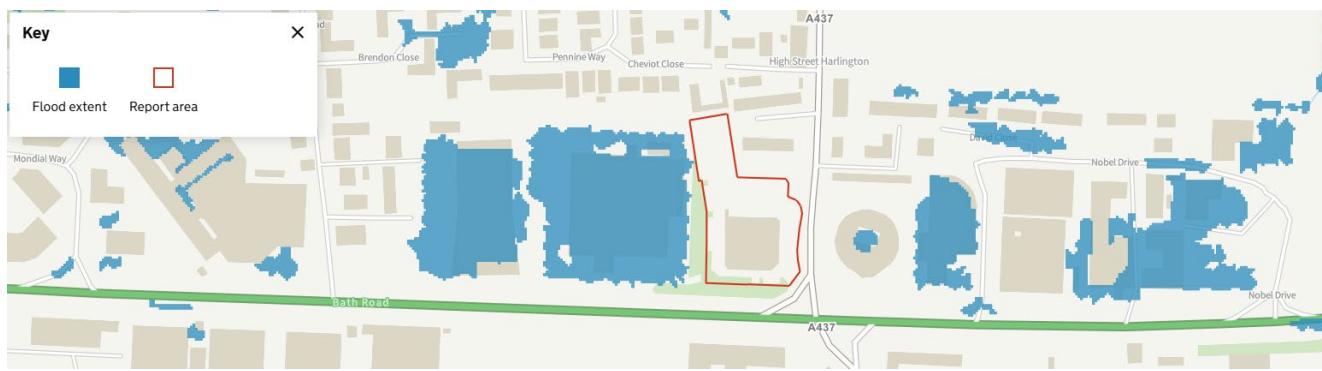


Figure 3 – EA Surface Water Flood Extent - 1 in 30 Annual Likelihood Event

The EA surface water flood extents map shown in Figure 4 indicates that the Site is outside surface water flood extent area in the 1 in 100 annual likelihood event.

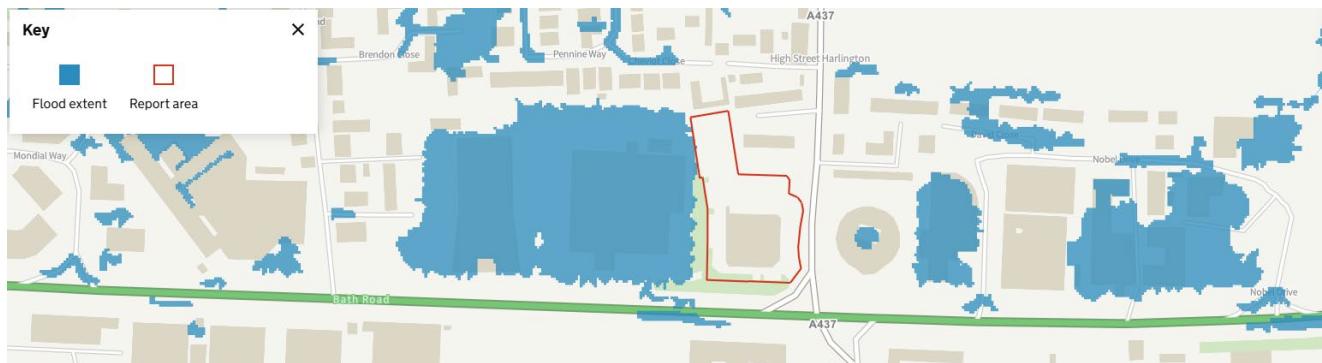


Figure 4 – EA Surface Water Flood Extent - 1 in 100 Annual Likelihood Event

The EA surface water flood extents map shown in Figure 5 indicates that the building is outside surface water flood extent area, but low-lying areas to the north and west of the Site being within the surface water flood extent area during the 1 in 1000 annual likelihood event.



Figure 5 – EA Surface Water Flood Extent - 1 in 1000 Annual Likelihood Event

## 5.2. Landmark Envirocheck Data Maps

Refer to Appendix D for Landmark Envirocheck flood map data. The summary of each of the maps is as follows:

### Flood Data Map

The EA/NRW flood data map also indicates that the Site is in Flood Zone 1.

### Pluvial, Fluvial and Coastal Flooding

The Envirocheck (JBA) 75-year to 200-year return period flood maps indicate that there is no pluvial fluvial or coastal flooding at the Site.

The Envirocheck (JBA) 1000-year return period flood map indicates that there is no fluvial or coastal flooding at the Site, with pluvial flooding to the north of the Site at depths of up to 0.10m.

### Surface Water Flood Depths

The Envirocheck (EA/NRW) 30-year to 100-year return period flood map indicates that there is no surface water / rainfall flood depth within the Site.

The Envirocheck (EA/NRW) 1000-year return period flood map indicates that there is only surface water / rainfall flooding to the north of the Site, with depths up to 0.15m.

### Ground Water Flooding

The Envirocheck / BGS flood data map indicates that there is no potential for groundwater flooding at the Site.

The ESI groundwater flood map indicates that there is a negligible risk of groundwater flooding at the Site.

## Canal Failure

The Envirocheck (JBA) canal failure map indicates that the Site is in the canal coverage, and not in a canal failure area.

## Historic Flood Map

The Envirocheck historic flood map indicates that there has been no flooding at the Site from any source.

### 5.3. DEFRA / EA Long Term Flood Risk

The DEFRA / EA long term rivers and sea flood map in Figure 6 indicates that all the site is outside flood extent area.

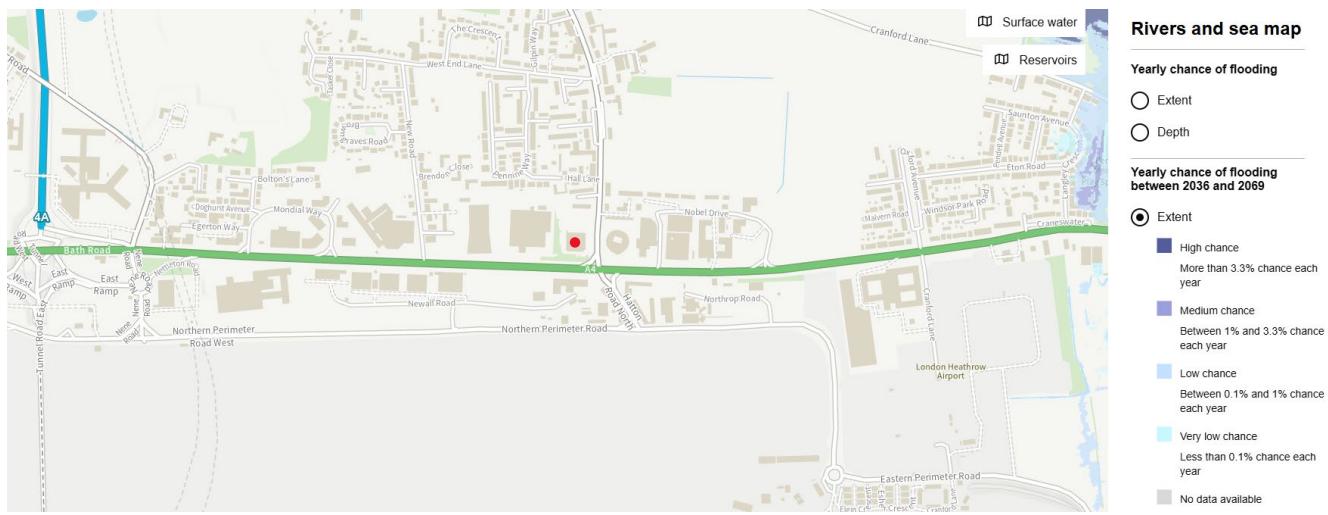


Figure 6 – DEFRA / EA Long Terms Flood Map – Rivers and Sea

The DEFRA / EA long term surface water flood map in Figure 7 indicates that the building is outside surface water flood extent area, with a low chance (between 0.1% and 1%) of flooding at the low-lying area to the north of the Site up to 0.20m between 2040 and 2060.

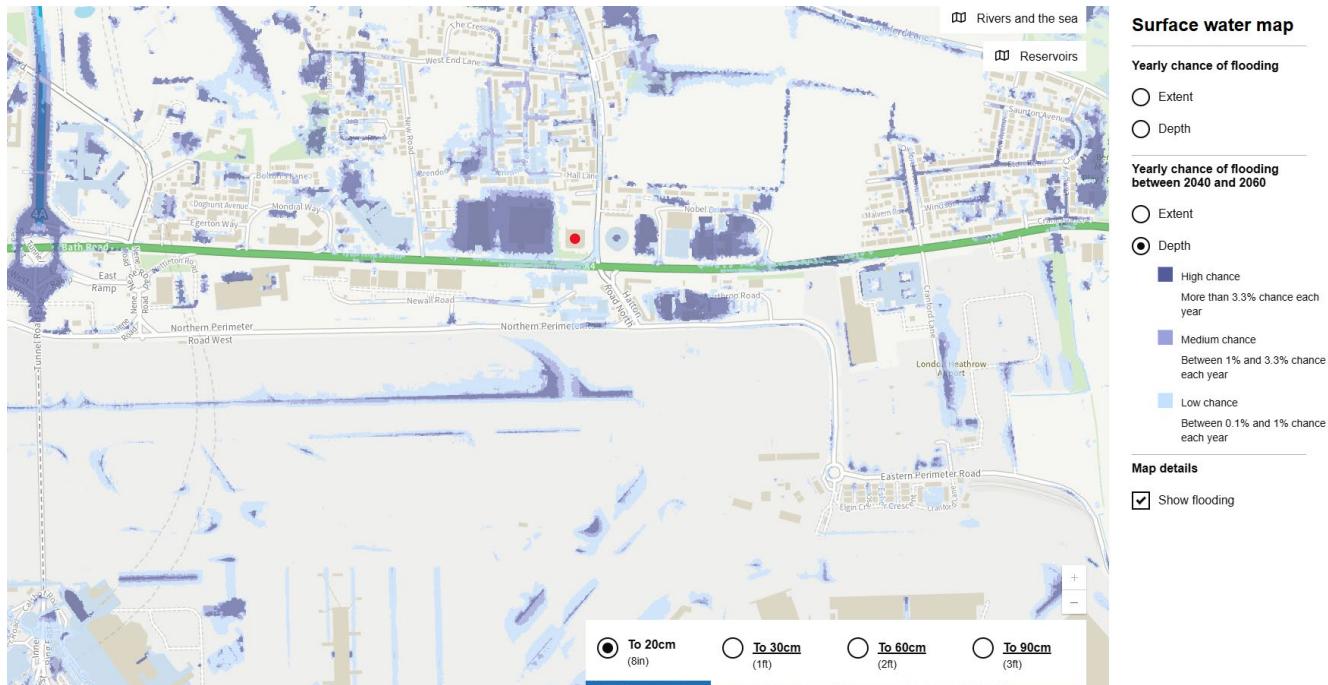


Figure 7 – DEFRA / EA Long Terms Flood Map – Surface Water Depth to 0.20m

The DEFRA / EA long term surface water flood map in Figure 8 indicates that all the Site is outside surface water flood extent area with depths up to 0.30m between 2040 and 2060.

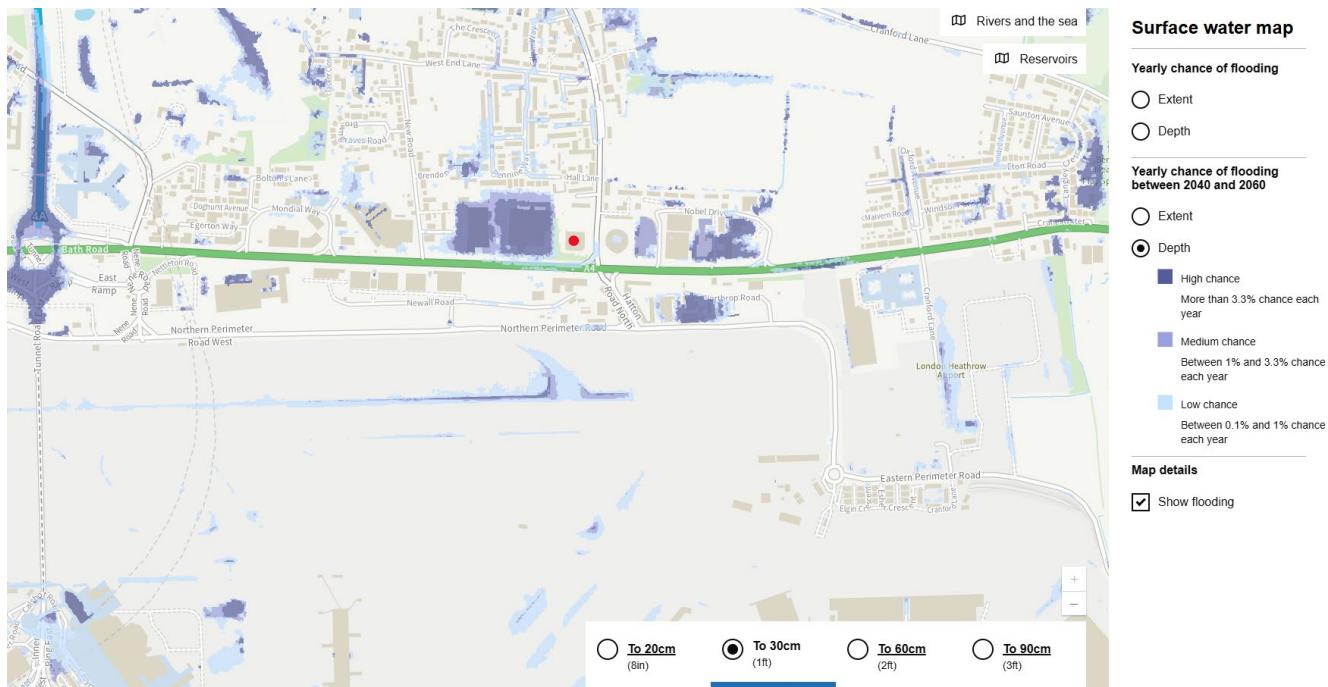


Figure 8 – DEFRA / EA Long Terms Flood Map – Surface Water Depth to 0.30m

The DEFRA / EA long term reservoir flood map in Figure 9 indicates that the Site is outside the reservoir flood extent area.

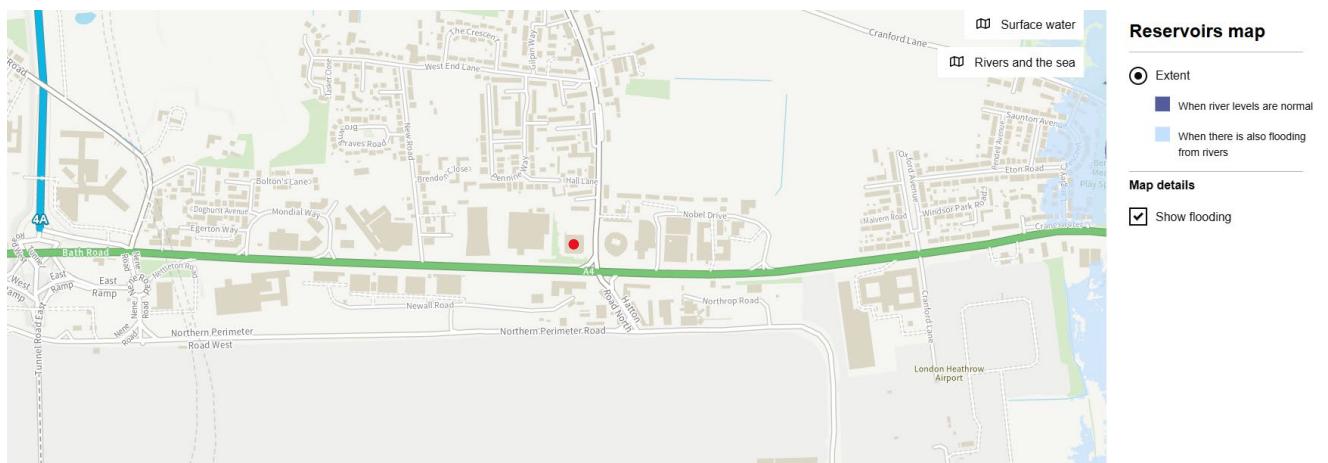


Figure 9 – DEFRA / EA Long Terms Flood Map – Reservoir

## 6. Probability of Flooding

### 6.1. Fluvial Flooding - Probability: **LOW**

The EA present day fluvial flood zone map for planning indicates that all the Site is in Present Day Flood Zone 1.

The EA future climate change (2070 to 2125) fluvial flood extent map for planning indicates that all the Site is outside the Future Climate Change Flood Extents.

The Envirocheck (JBA) 75-year to 1000-year return period flood maps indicate that there is no fluvial or coastal flooding at the Site.

The DEFRA / EA long term rivers and sea flood map indicates that all the site is outside flood extent area.

Therefore, based on the assessed flood map data, the Site has a low probability of fluvial flooding.

### 6.2. Pluvial Flooding - Probability: **LOW**

The EA surface water flood extents map for planning indicates that the Site is outside surface water flood extent area in the 1 in 30 and 1 in 100 annual likelihood event.

The EA surface water flood extents map for planning indicates that the building is outside surface water flood extent area, but low-lying areas to the north and west of the Site being within the surface water flood extent area during the 1 in 1000 annual likelihood event.

The Envirocheck (JBA) 75-year to 200-year return period flood maps indicate that there is no pluvial flooding at the Site, but the Envirocheck (JBA) 1000-year return period flood map indicates that there is pluvial flooding to the north of the Site at depths up to 0.10m.

The Envirocheck (EA/NRW) 30-year to 100-year return period flood map indicates that there is no surface water / rainfall flood depth within the Site, but the Envirocheck (EA/NRW) 1000-year return period flood map indicates that there is surface water / rainfall flooding to the north of the Site, with depths up to 0.15m.

The DEFRA / EA long term surface water flood map indicates that the building is outside surface water flood extent area, with a low chance (between 0.1% and 1%) of flooding at the low-lying area to the north of the Site up to 0.20m between 2040 and 2060.

The DEFRA / EA long term surface water flood map indicates that all the Site is outside surface water flood extent area with depths up to 0.30m between 2040 and 2060.

**Flood map data shows flooding within the Site is during 1000-year return period only, and therefore the Site has a low probability of flooding.**

The maps show that the flood extent of to the north of the Site, which corresponds to the topographical survey which shows this to be the low-lying areas.

The DEFRA / EA long term surface water flood map shows no flooding up to 0.30m, with flood depths up to 0.15m and 0.20m on all other flood maps. Therefore, the maximum surface water (pluvial) flood depth to the north of the Site is deemed to be 0.20m.

The lowest level to the north of the Site is 24.70m AOD, and therefore the estimated surface water (pluvial) flood level at the Site is 24.90m AOD.

### 6.3. Groundwater Flooding - Probability: **LOW**

BGS data shows the ground to have Superficial Deposits of Langley Silt Member (clay and silt), over bedrock consisting of London Clay Formation (clay).

The Envirocheck / BGS flood data map indicates that there is no potential for groundwater flooding at the Site.

The ESI groundwater flood map indicates that there is a negligible risk of groundwater flooding at the Site.

Therefore, based on the assessed data, the risk of groundwater flooding is deemed to be low.

### 6.4. Flooding from Drains and Sewers - Probability: **LOW**

It is believed that the nearest sewer networks to the Site are in High Street Harlington to the east and Bath Road to the south.

There has been no known history of flooding from the sewers.

If flooding were to occur from the sewers within the road, the flood water would be contained, due to kerb upstands and gradient, and will flow away from the Site due to the topography of the ground – High Street Harlington falling in a southerly direction and Bath Road falling in a westerly direction.

Therefore, the risk of flooding to the Site from the sewers is deemed to be low.

### 6.5. Canals, Reservoirs and Other Artificial Sources - Probability: **LOW**

The Envirocheck (JBA) canal failure map indicates that the Site is in the canal coverage, and not in a canal failure area.

The DEFRA / EA long term reservoir flood map indicates that the Site is outside the reservoir flood extent area.

There are no other artificial waterbodies near the Site (other than canals and reservoirs), and therefore the probability of flooding is deemed to be low.

## 7. Flood Risk and Vulnerability

The NPPG Paragraphs 077 to 078 set out the flood risk for the Site by assessing the flood zones, flood risk vulnerability classification, and flood risk vulnerability and flood zone 'compatibility'.

### 7.1. Flood Zones

NPPG Paragraph 077, Table 1 indicates that the flood zones are:

Flood Zone	Definition
<b>Zone 1 Low Probability</b>	Land having a less than 1 in 1,000 annual probability of river or sea flooding. (Shown as 'clear' on the Flood Map – all land outside Zones 2 and 3)
Zone 2 Medium Probability	Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or Land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding. (Land shown in light blue on the Flood Map)
Zone 3a High Probability	Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding. (Land shown in dark blue on the Flood Map)
Zone 3b The Functional Floodplain	This zone comprises land where water from rivers or the sea has to flow or be stored in times of flood. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. Functional floodplain will normally comprise: <ul style="list-style-type: none"> <li>• land having a 3.3% or greater annual probability of flooding, with any existing flood risk management infrastructure operating effectively; or</li> <li>• land that is designed to flood (such as a flood attenuation scheme), even if it would only flood in more extreme events (such as 0.1% annual probability of flooding).</li> </ul> Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. (Not separately distinguished from Zone 3a on the Flood Map)

The EA flood map data has identified that the Site is in **Flood Zone 1**.

## 7.2. Flood Risk Vulnerability Classification

NPPG Paragraph 066, Table 2 stated the flood risk vulnerability classifications as:

Flood Risk Vulnerability Classification	
<b>Essential Infrastructure</b>	
<p>Essential transport infrastructure (including mass evacuation routes) which should cross the area at risk; Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood; Wind turbines.</p>	
<b>Highly Vulnerable</b>	
<p>Police and ambulance stations; fire stations and command centers; telecommunications installations required to be operational during flooding; Emergency dispersal points; Basement dwellings; Caravans, mobile homes and park homes intended for permanent residential use; Installations requiring hazardous substances consent.</p>	
<b>More Vulnerable</b>	
<p>Hospitals; Residential institutions such as residential care homes, children's homes, social services homes, prisons and hostels; Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and <b>hotels</b>; Non-residential uses for health services, nurseries and educational establishments; Landfill* and sites used for waste management facilities for hazardous waste; Sites used for holiday or short-let caravans and camping, subject to a specific warning and evacuation plan.</p>	
<b>Less Vulnerable</b>	
<p>Police, ambulance and fire stations which are not required to be operational during flooding; Buildings used for shops; financial, professional and other services; restaurants, cafes and hot food takeaways; offices; general industry, storage and distribution; non-residential institutions not included in the 'More Vulnerable' class; and assembly and leisure; Land and buildings used for agriculture and forestry; Waste treatment (except landfill* and hazardous waste facilities); Minerals working and processing (except for sand and gravel working); Water treatment works which do not need to remain operational during times of flood.</p>	
<b>Water-Compatible Development</b>	
<p>Flood control infrastructure; Water transmission infrastructure and pumping stations; Sewage transmission infrastructure and pumping stations; Sand and gravel working; Docks, marinas and wharves; Navigation facilities; Ministry of Defence installations; Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location; Water-based recreation (excluding sleeping accommodation); Lifeguard and coastguard stations; Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms; Essential ancillary sleeping or residential accommodation for staff required by uses in this category, subject to a specific warning and evacuation plan.</p>	

The Site is deemed to be '**More Vulnerable**' as the development will be for a conversion of an office building to a hotel.

### 7.3. Flood Risk Vulnerability and Flood Zone 'Compatibility'

Table 3 of the NPPF identifies is a development is appropriate based on the flood zone to which the site lies, and the flood risk vulnerability classification.

NPPF – Table 3 - Flood Risk Vulnerability and Flood Zone 'Compatibility'					
Flood Zones	Flood Risk Vulnerability Classification				
	Essential Infrastructure	Highly Vulnerable	More Vulnerable	Less Vulnerable	Water Compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	† Exception Test required	X	Exception Test required	✓	✓
Zone 3b*	* Exception Test required	X	X	X	✓*

“†” In Flood Zone 3a essential infrastructure should be designed and constructed to remain operational and safe in times of flood.

“\*” In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows and not increase flood risk elsewhere.

The development is deemed to be ‘More Vulnerable’, but as the Site is in **Flood Zone 1**, Table 2 of the NPPG shows the Site is **appropriate for development, with no requirement for an exception test**.

## 8. The Sequential Test and Exception Test

### 8.1. The Guidance

NPPF Paragraph 175 states:

*'The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)'.*

NPPF Paragraph 176 states:

*'Applications for some minor development and changes of use (footnote 62) should also not be subject to the sequential test, nor the exception test set out below, but should still meet the requirements for site-specific flood risk assessments set out in footnote 63'.*

Footnote 62 states:

*'This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate'.*

Footnote 63 states:

*'A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use'.*

### 8.2. The Sequential Test

The site is in Flood Zone 1, with flood map data showing the Site to have a low probability of flooding from all other sources.

The development is the conversion of an existing building. Therefore, in accordance with NPPF Paragraph 176 and Foot Note 62, the site should not be subject to the sequential test.

Therefore, based on the above, the Site meets the requirements of the sequential test in accordance with the NPPF.

## 9. Safe Development over Lifetime

The NPPF (December 2024) Paragraph 178 (b) states:

*'It should be demonstrated that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall'.*

Therefore, the design principles, to ensure the converted building is safe for its lifetime, will include:

- Suitable ground floor levels of the hotel to meet EA requirements;
- Ensuring no flood flows are displaced to areas outside the Site area and increasing flood risk;
- safe egress from the converted building / hotel during a flood event;
- Ensuring surface water run-off from the site will not increase flood risk elsewhere.

### 9.1. Understanding Flood Levels

Flood map data shows flooding within the Site is during 1000-year return period only, and therefore the Site has a low probability of flooding.

The maps show that the flood extent of to the north of the Site, which corresponds to the topographical survey which shows this to be the low-lying areas.

The DEFRA / EA long term surface water flood map shows no flooding up to 0.30m, with flood depths up to 0.15m and 0.20m on all other flood maps. Therefore, the maximum surface water (pluvial) flood depth to the north of the Site is deemed to be 0.20m.

The lowest level to the north of the Site is 24.70m AOD, and therefore the estimated **surface water (pluvial) flood level is 24.90m AOD**.

### 9.2. Finished Floor Levels

The EA - Preparing a flood risk assessment: standing advice (10th April 2025) states:

*'We recommend floor levels are set at least 600 millimetres (mm) above the estimated flood level. You will also need to use flood resistant materials up to at least 600mm above the estimated flood level.'*

*'You may be able to reduce this to 300mm if there is a high level of certainty about your estimated flood level. If there is a particularly high level of uncertainty it may need to be increased.'*

*'Flood water can put pressure on buildings, causing structural issues. If your design aims to keep out a depth of more than 600mm of water, you should get advice from a structural engineer.'*

*'If you cannot raise the floor levels in this way, you will also need to include extra flood resistance and resilience measures. These measures should protect the property to at least 600mm above the estimated flood level'.*

The ground finished floor level of the building, consisting of the hotel rooms / sleeping accommodation, will remain the same in a pre and post conversion state, and will therefore be 25.53m AOD.

The estimated maximum surface water (pluvial) flood level within the Site is 24.90m AOD, and therefore the ground **floor level of the hotel will be 630mm above the estimated flood level**.

This is deemed to be acceptable (based on EA guidance stated above), with no flood resistance or resilience requirements.

### 9.3. Flood Flows and Water Displacement

The extent of the building is to remain as existing, with the external levels and surface water discharge routes remaining as existing. Therefore, the conversion of the existing building to hotel:

- will not displace surface water to other areas outside the site boundary,
- will not increase the flood levels in areas outside the site boundary,
- and subsequently will not increase flood risk to any areas outside the site boundary.

### 9.4. Safe Access and Egress

As detailed on the existing and proposed plans in Appendix A and B, respectively, the entrance / exit threshold of the building will not change and will remain as 25.04m AOD.

The exist / exist thresholds will therefore be 140mm above the estimated 1000-year storm event surface water (pluvial) flood level.

The main entrance / exit location to the hotel will be to the east of the Site, where the external level ranges from 25.02m AOD to 24.91m AOD at High Street Harlington, which is higher than the estimated flood level.

All flood map data shows no flooding from any source up to the 1000-year likelihood event to the east of the Site.

Therefore, safe access and egress can be made to and from the hotel, via the main entrance to the east during all storm and flood events.

### 9.5. Surface Water Management Statement

Topographical survey plans show a series of rainwater pipes, gullies, channel drains and manhole covers within the car park and access areas of the Site.

Therefore, it is believed that there are existing drainage networks within the Site that take the surface water run-off from the building and external hard-standing areas, and discharges to the sewers within the roads.

The building extent will remain as existing, and the external works will not affect current surface water networks, discharge rates / volumes, or discharge destination.

Consequently, there will be no increase in surface water rate or volume, with the conversion of the exiting building not increasing the risk of flooding to the existing drainage networks / sewers or adjacent land / properties.

## 10. Summary / Conclusion

The Site, in a pre-development state, consists of an office building (Use Class E) to the centre, with parking and access around the perimeter, further parking to the north, and landscaping with trees around the boundaries.

The proposed development includes the change of use of the existing building from Class E (office) to Class C1 (hotel), with infill extension, together with ancillary hotel facilities, car parking, drop-off and servicing arrangements, and associated landscaping.

The EA present day fluvial flood zone map for planning maps indicates that all the Site is in Flood Zone 1, and outside the future climate change flood extents.

Flood map data shows flooding within the Site is during 1000-year return period only, and therefore the Site has a low probability of flooding.

Flood map data shows there to be a low probability of flooding from all other sources.

Surface water flood extent (in a 1000-year storm event only) is to the north of the Site, which corresponds to the topographical survey which shows this to be the low-lying areas.

The DEFRA / EA long term surface water flood map shows no flooding up to 0.30m, with flood depths up to 0.15m and 0.20m on all other flood maps. Therefore, the maximum surface water (pluvial) flood depth to the north of the Site is deemed to be 0.20m.

The lowest level to the north of the Site is 24.70m AOD, and therefore the estimated surface water (pluvial) flood level is 24.90m AOD.

The ground finished floor level of the building, consisting of the hotel rooms / sleeping accommodation, will remain the same in a pre and post conversion state, and will therefore be 25.53m AOD.

The estimated maximum surface water (pluvial) flood level within the Site is 24.90m AOD, and therefore the ground floor level of the hotel will be 630mm above the estimated flood level.

The extent of the building is to remain as existing, with the external levels and surface water discharge routes remaining as existing. Therefore, the conversion of the existing building to hotel: will not displace surface water to other areas outside the site boundary, will not increase the flood levels in areas outside the site boundary, and subsequently will not increase flood risk to any areas outside the site boundary.

The main entrance / exit location to the hotel will be to the east of the Site, where the external level ranges from 25.02m AOD to 24.91m AOD at High Street Harlington, which is higher than the estimated flood level.

All flood map data shows no flooding from any source up to the 1000-year likelihood event to the east of the Site.

Therefore, safe access and egress can be made to and from the hotel, via the main entrance to the east during all storm and flood events.

It is believed that there are existing drainage networks within the Site that take the surface water run-off from the building and external hard-standing areas, and discharges to the sewers within the roads. The building extent will remain as existing, and the external works will not affect current surface water networks, discharge rates / volumes, or discharge destination.

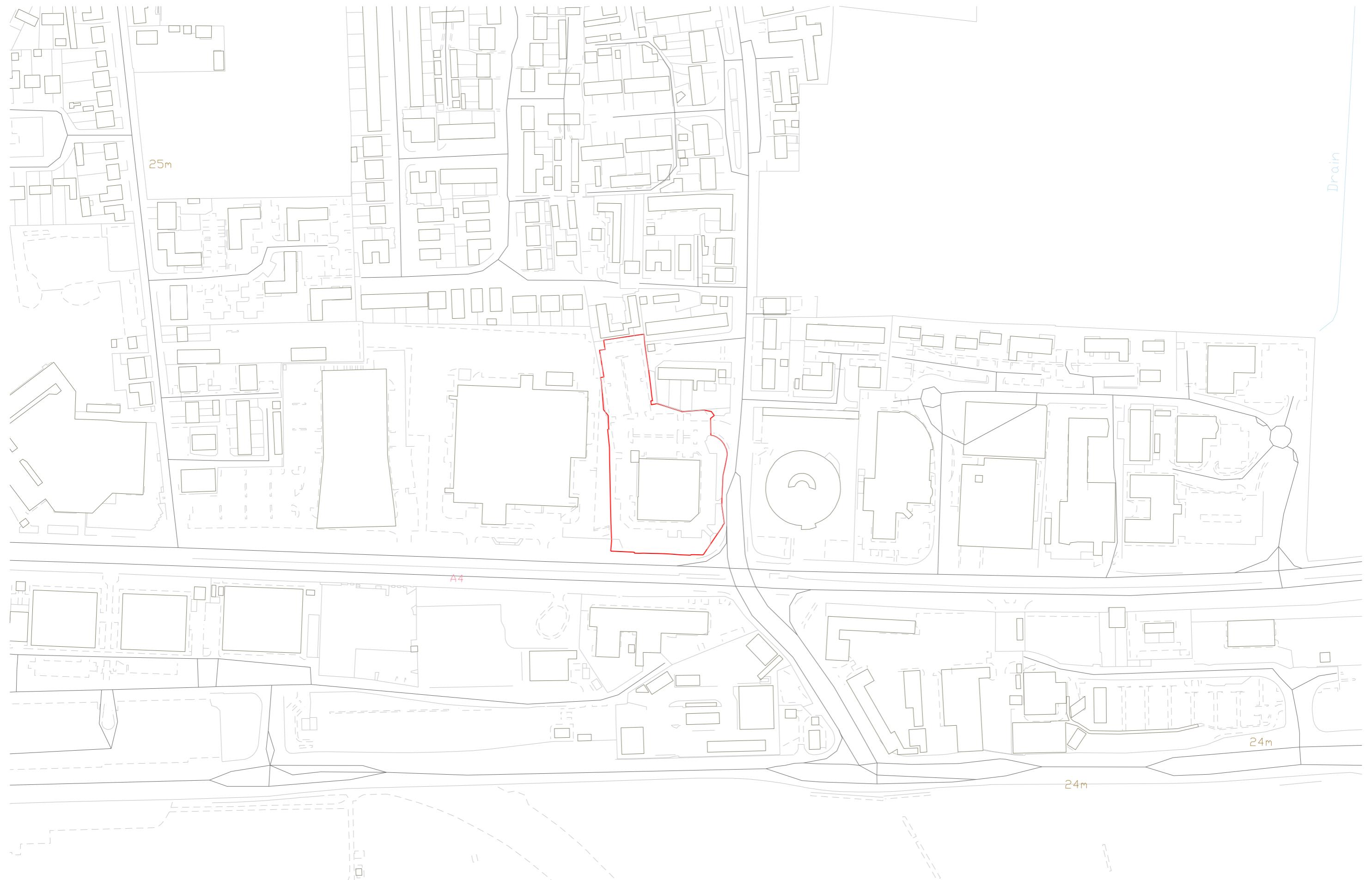
Consequently, there will be no increase in surface water rate or volume, with the conversion of the exiting building not increasing the risk of flooding to the existing drainage networks / sewers or adjacent land / properties.

Based on this assessment, the proposed development is safe for its lifetime in terms of its users and will not increase flood risk to neighboring land or property.

Therefore, the development, in terms of flood risk, is deemed to be acceptable.

## Appendix A

## Site Location Plan



revision: P01 date: 20251127 note: initial planning issue

key:  
site boundary 



project  
Toyoko Inn, Heathrow  
Job no.  
7697

title  
site location plan

scale  
1:1250 @ A3 / 1:2500 @ A1

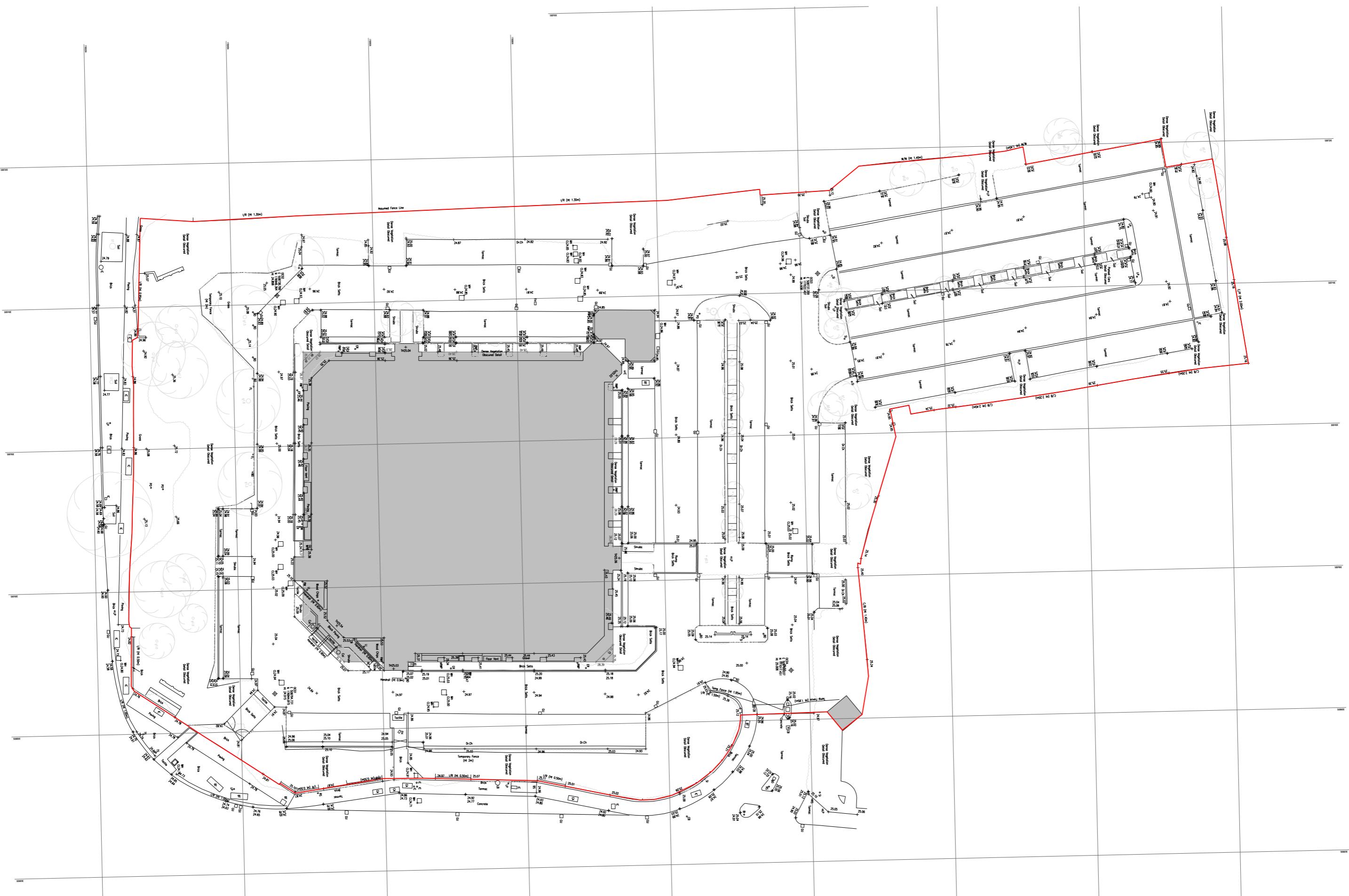
drawing no.  
**7697-a1(05)0002**

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## Appendix B

## Existing Site Plans



revision: date: note:  
P01 20251127 initial planning issue



project  
Toyoko Inn, Heathrow  
Job no.  
7697

title  
Existing Site Plan  
scale  
1:500 @ A3

drawing no.  
**7697-al(02)0001**

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P01 20251127 initial planning issue

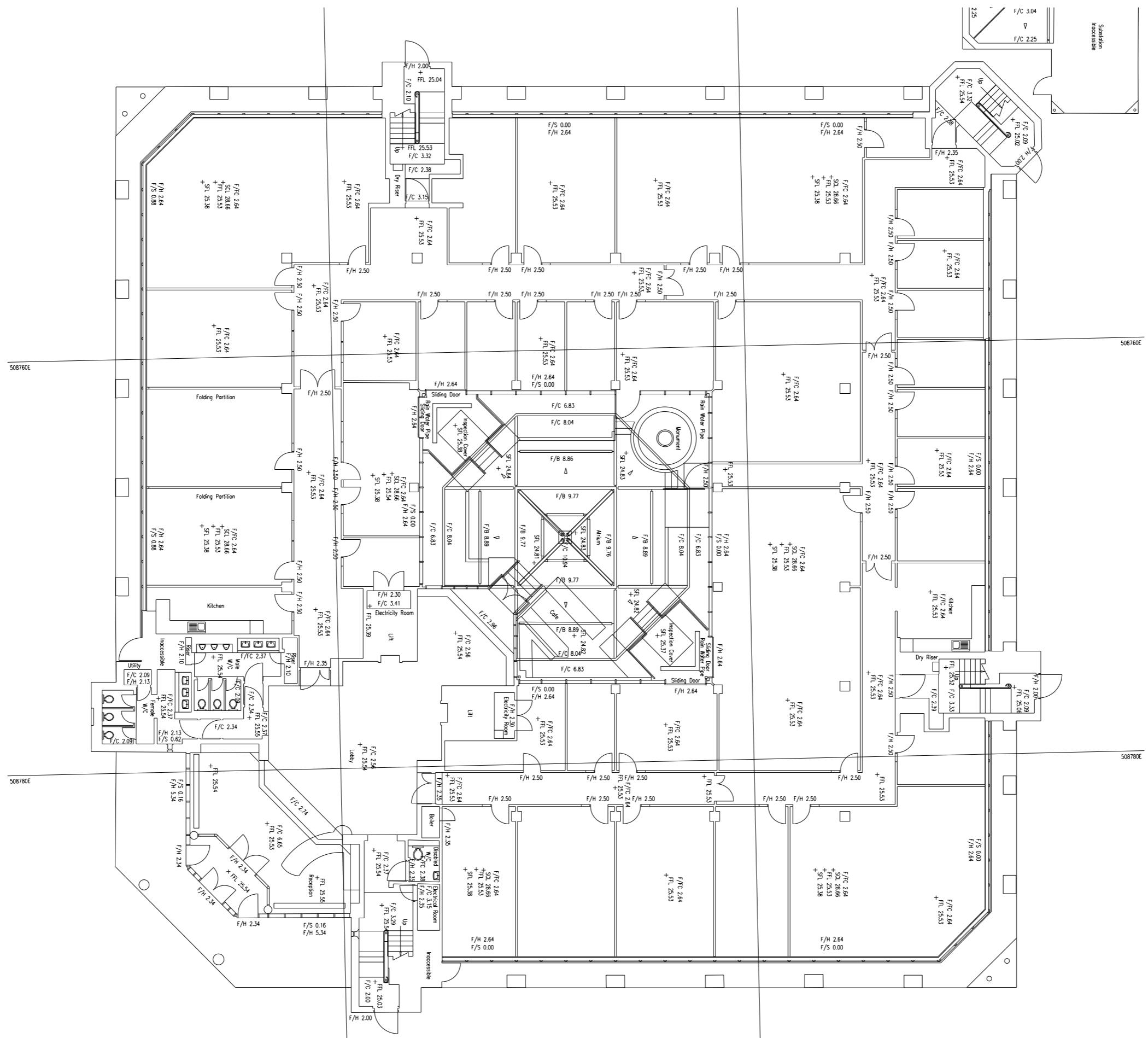
key:  
site boundary



**project**  
Toyoko Inn, Heathrow  
**job no.**  
7697  
**title**  
Site Location Plan  
**scale**  
1:1250 @ A3  
**drawing no.**  
al(02)0002

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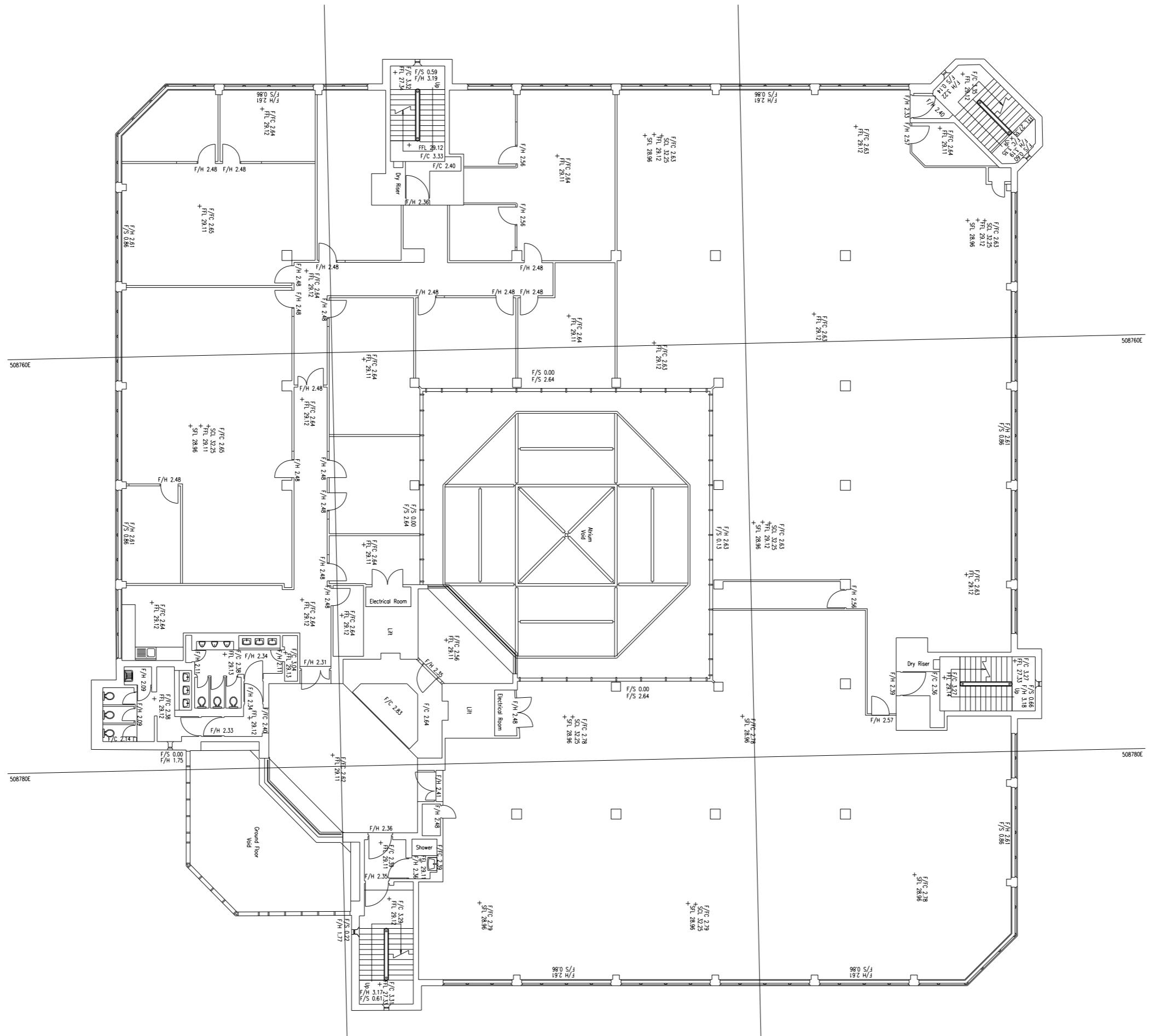
**project**  
Toyoko Inn, Heathrow  
**job no.**  
7697

**title**  
Existing GF Plan  
**scale**  
1:200 @ A3/ 1:100 @

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P01 20251127 initial planning issue

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**job no.**  
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**title**  
Existing 1st Floor Plan  
**scale**

scale  
1:200 @ A3/ 1:100 @A1

drawing no. **1001** (00)

7697-al(02)

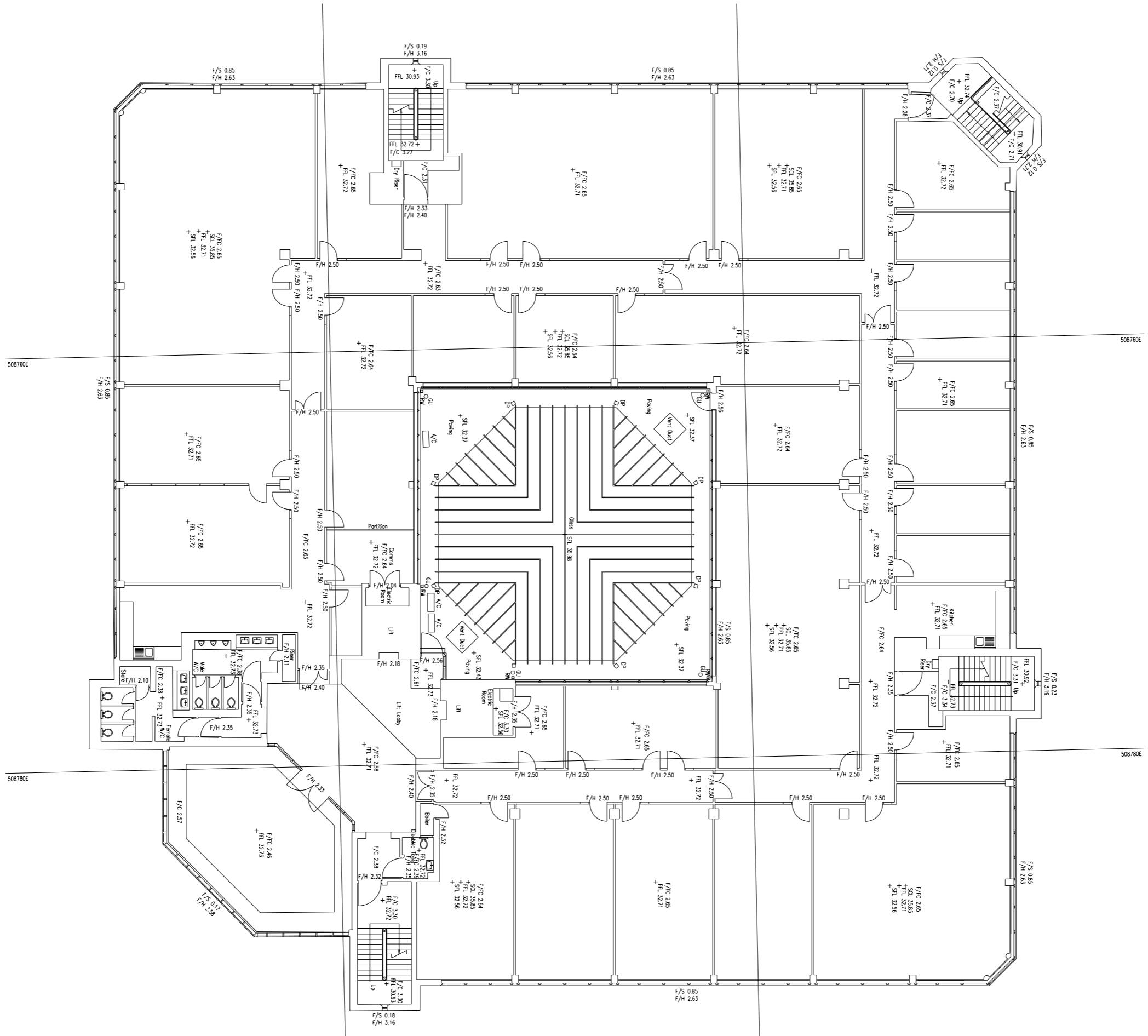
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P01 20251127 initial planning issue

**project**  
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**job no.**  
7697

## **title**

**scale**

1:200 @ A3/ 1:100 @A1

drawing no.

7697-al(02)

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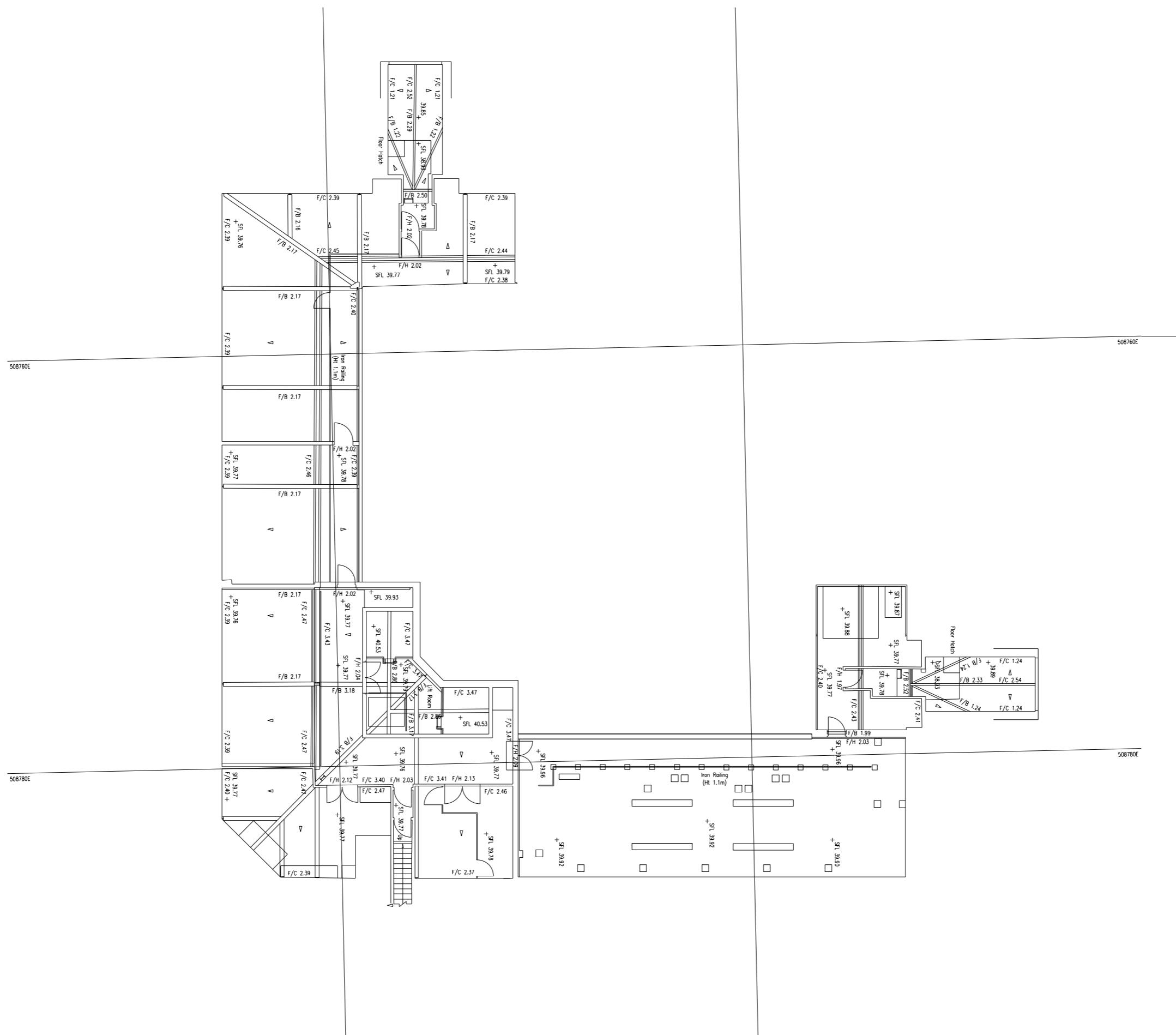
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**job no.**  
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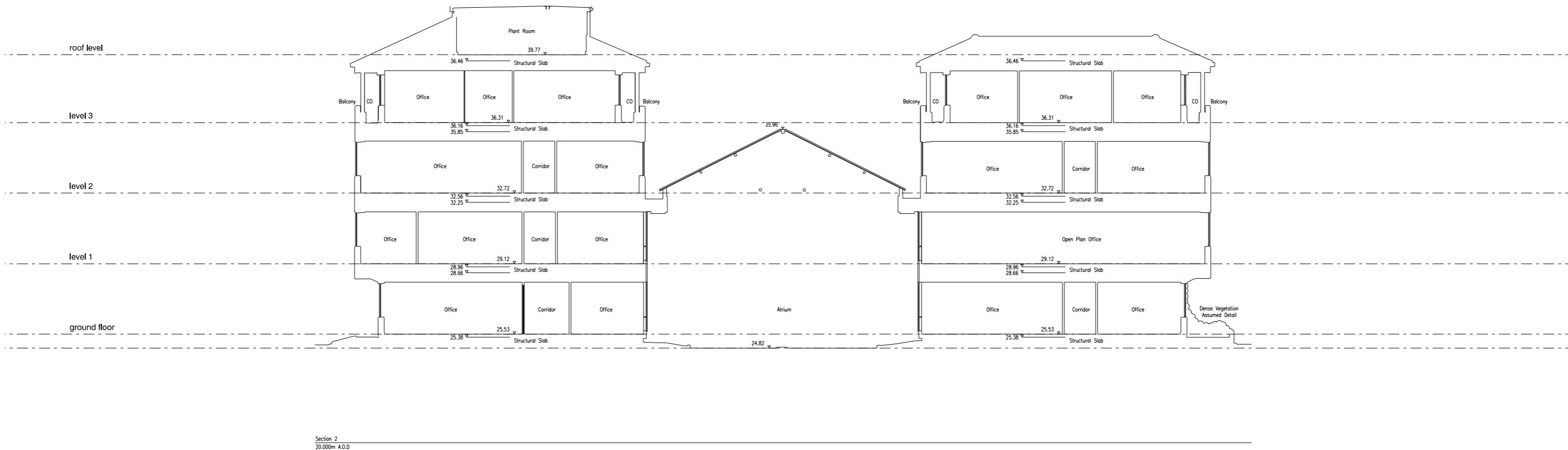
### title

Existing root plan  
**scale**  
1:200 @ A3/ 1:100 @A1

1.200 @ A3 / 1.100 @ A1

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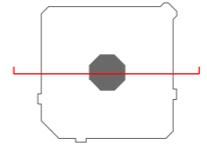
revision: date: note:  
P01 20251127 initial planning issue

project  
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Job no.  
7697

title  
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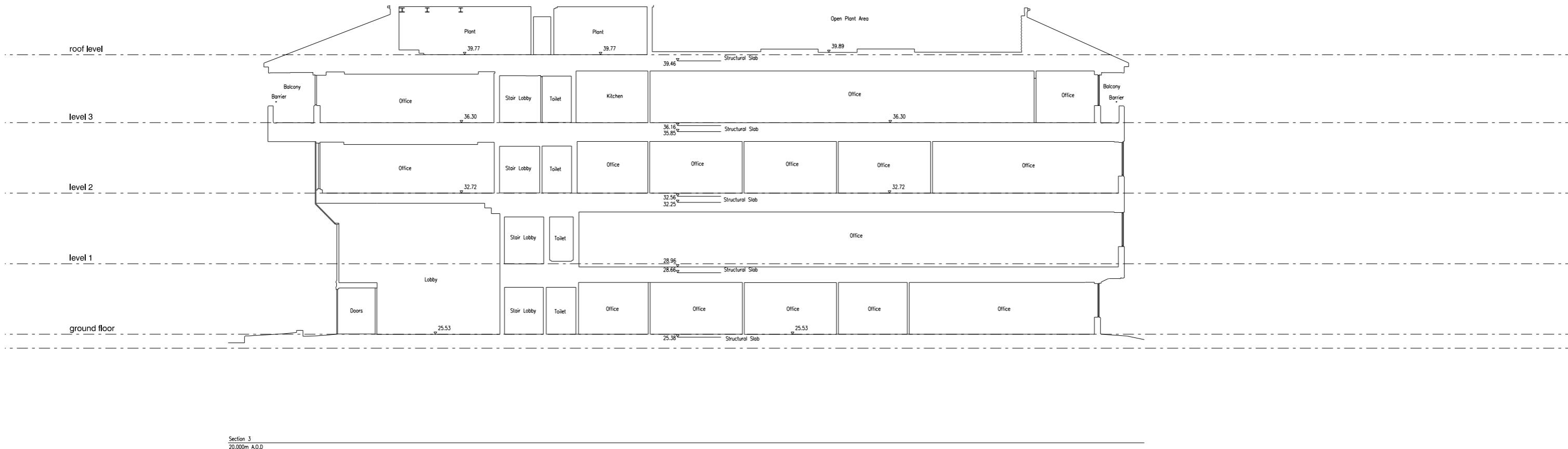
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drawing no.  
**7697-al(02)0015**



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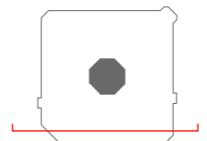


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P01 20251127 initial planning issue

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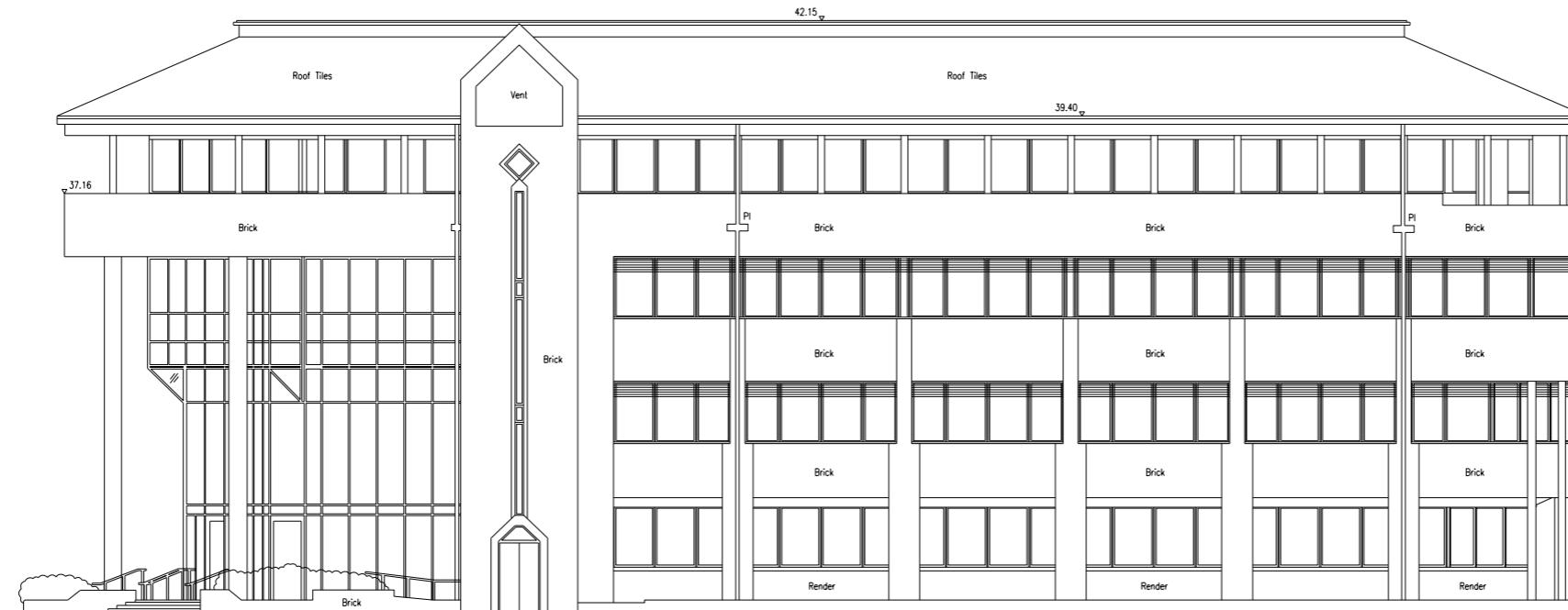
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7697  
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7697-al(02)0016



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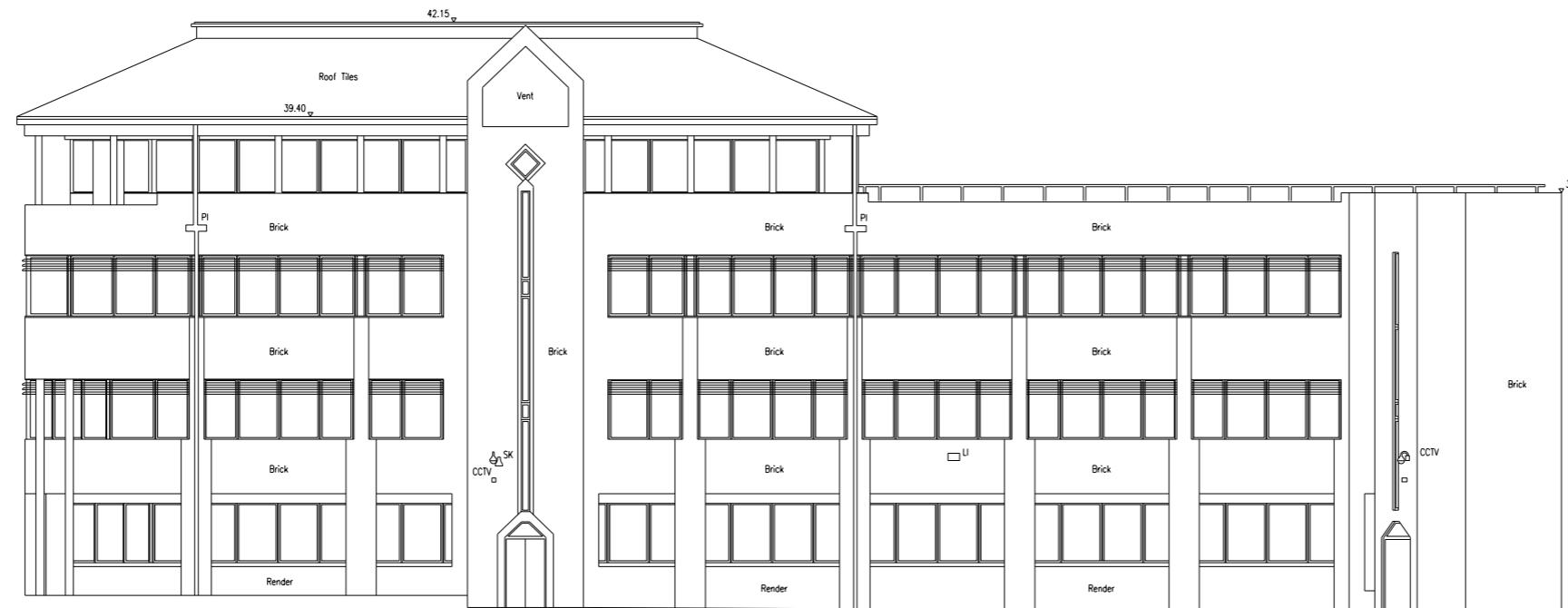
project  
Toyoko Inn, Heathrow  
Job no.  
7697

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scale  
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drawing no.  
**7697-a1(02)0021**

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title  
Existing E02 North Elevation  
scale  
1:200 @ A3/ 1:100 @A1

drawing no.  
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Elevation 3  
20.000m A.O.D

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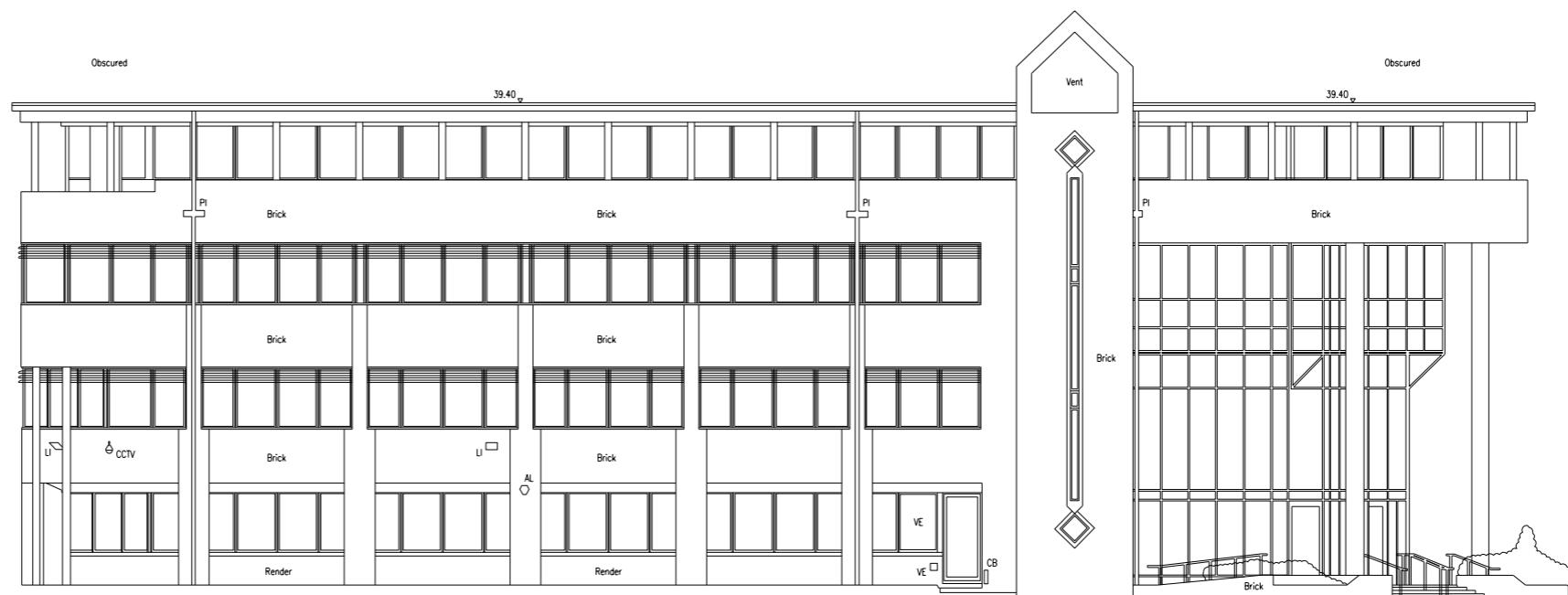
project  
Toyoko Inn, Heathrow  
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Existing E03 West Elevation  
scale  
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drawing no.  
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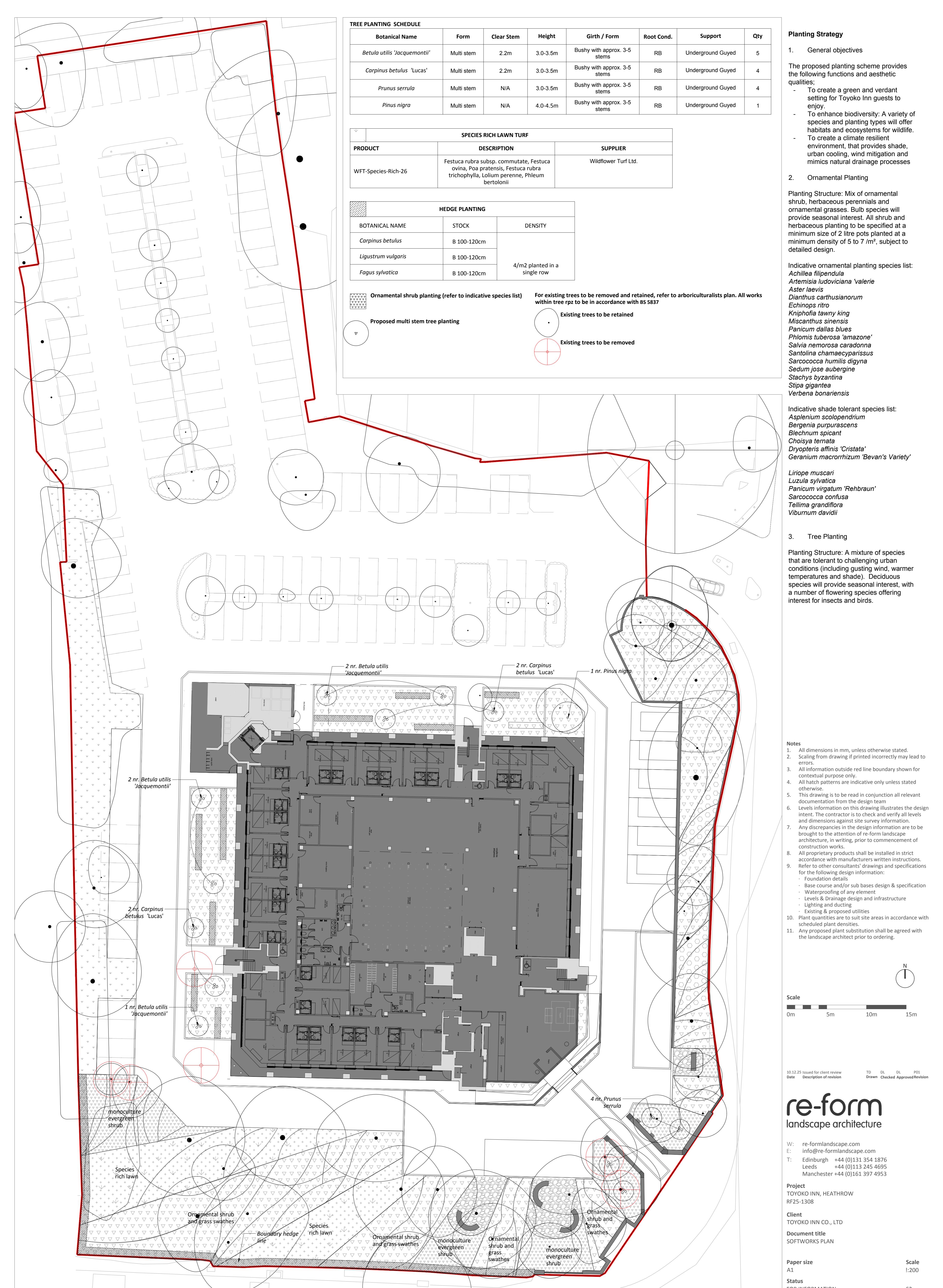
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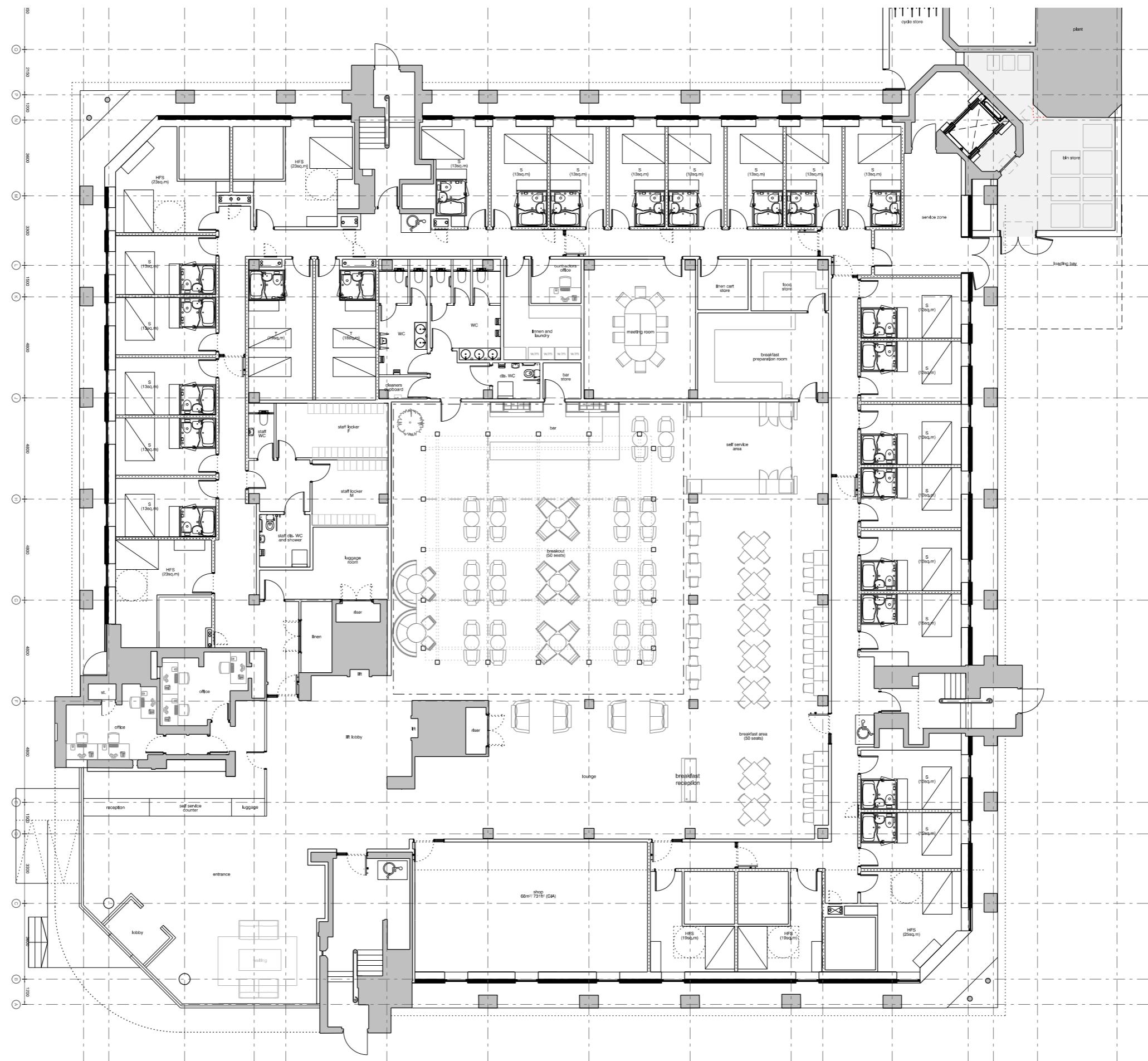
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**Appendix C      Proposed Site Plans**





revision:	date:	note:
P01	20251127	initial planning issue
P02	20251204	preliminary second issue
P03	20251208	preliminary third issue

NB - site layout as per landscape architects design - not shown until final design confirmed  
- furniture layout Indicative



**project**  
Toyoko Inn, Heathrow  
**job no.**  
7697

7057

## title

### Proposed ground floor plan

### scale

1:200 @ A3/ 1

drawing no.

7897-ai(05)0010

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## Appendix D

## Envirocheck Flood Map Data

## EA/NRW Flood Data Map (1:10,000)

### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

### Flood Data

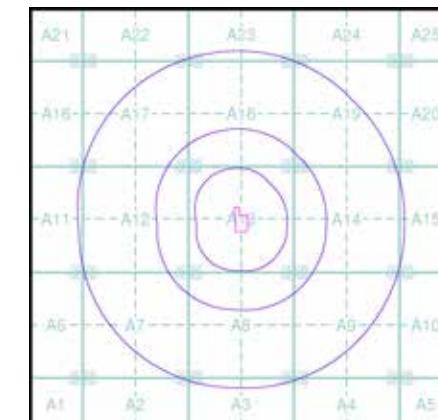
- Extreme Flooding from Rivers or Sea without Defences (Zone 2)
- Flooding from Rivers or Sea without Defences (Zone 3)
- Area Benefiting from Flood Defence
- Flood Water Storage Areas
- Flood Defence

### Contours (height in metres)

- Standard Contour
- Master Contour
- Spot Height

MLW Mean Low Water  
MHW Mean High Water

## EA/NRW Flood Data Map - Slice A

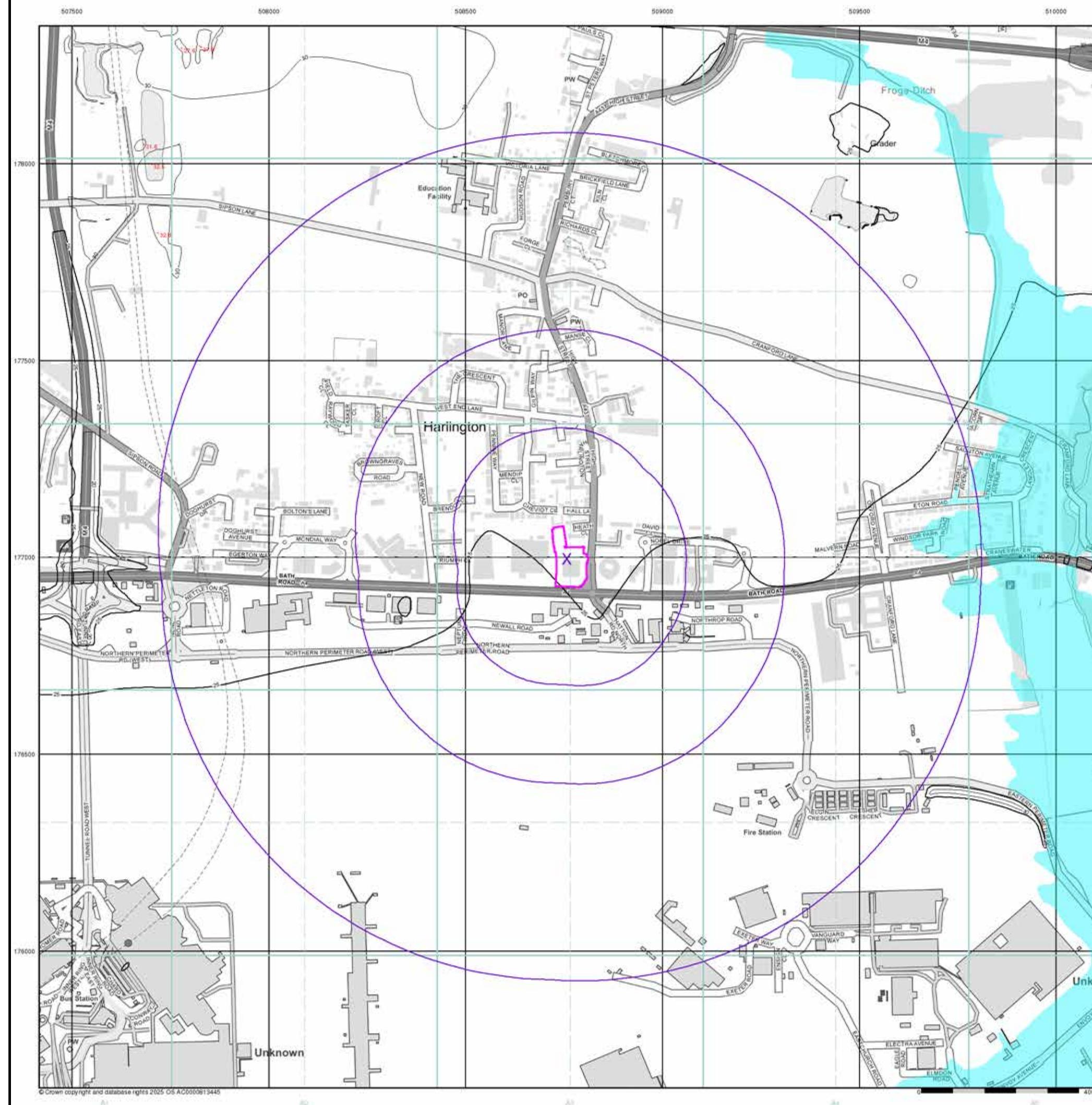


### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN



## JBA 75 Year Return Flood Map (Undefended) (1:10,000)

### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

### Modelled Flood Depth

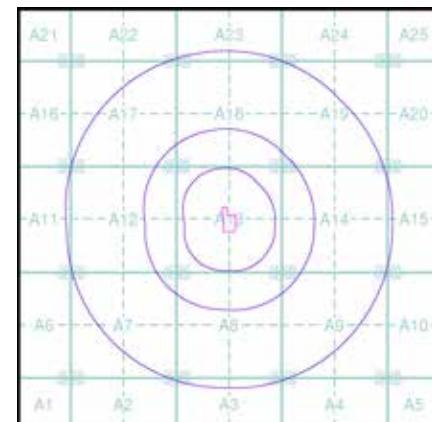
Pluvial Depth	Fluvial Depth	Coastal Depth
0.1m	0.01m - 0.05m	0.01m - 0.05m
0.1m - 0.3m	0.05m - 0.1m	0.05m - 0.1m
0.3m - 1m	0.1m - 0.3m	0.1m - 0.3m
>1m	0.3m - 1m	0.3m - 1m
	>1m	>1m

### Contours (height in metres)

- Standard Contour
- Master Contour
- Spot Height

MLW - Mean Low Water  
MHW - Mean High Water

## JBA 75 Year Return Flood Map (Undefended) - Slice A

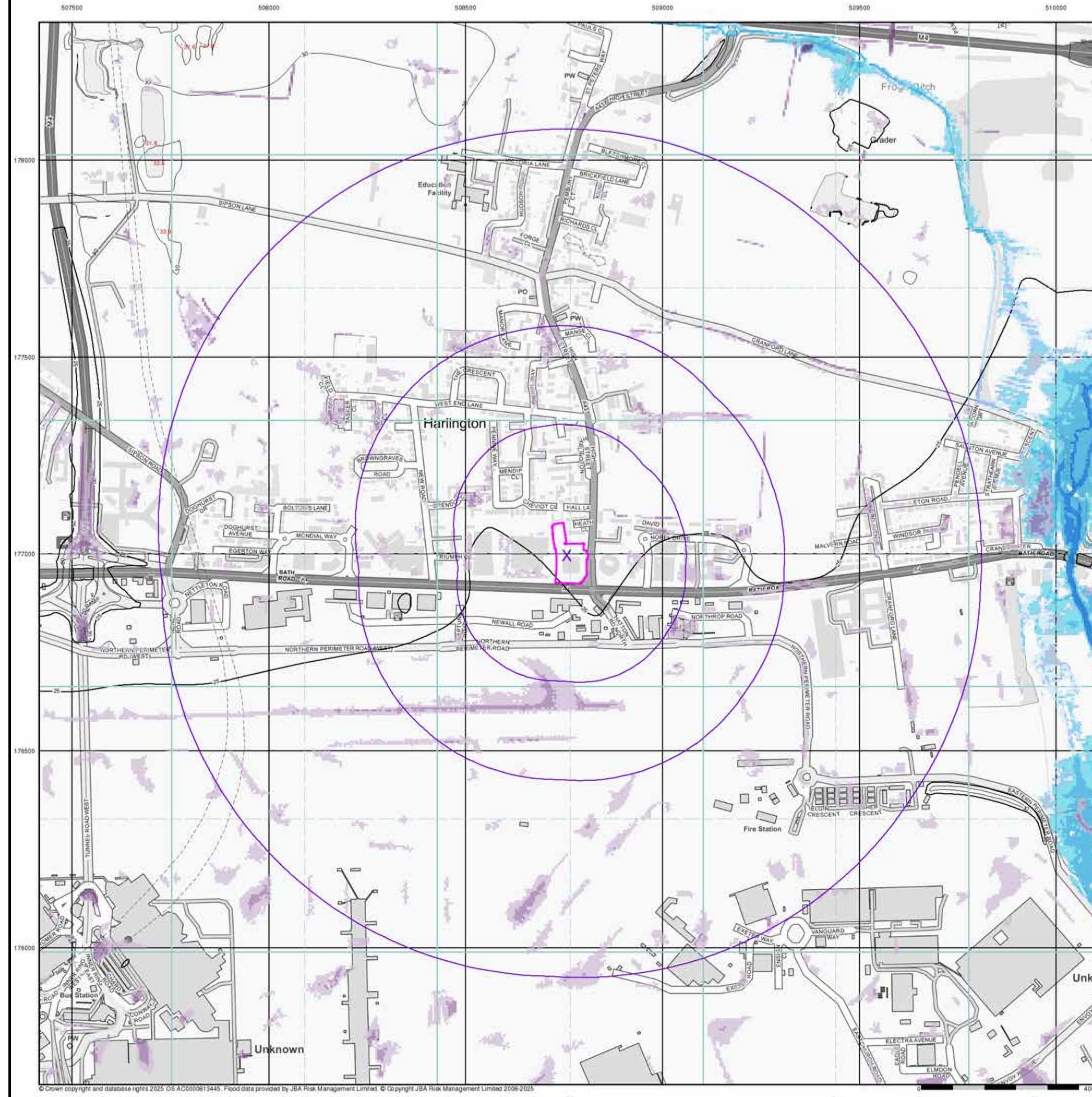


### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN

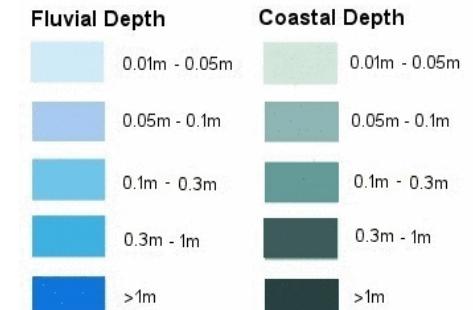


## JBA 100 Year Return Flood Map (Undefended) (1:10,000)

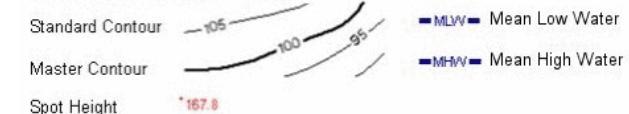
### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

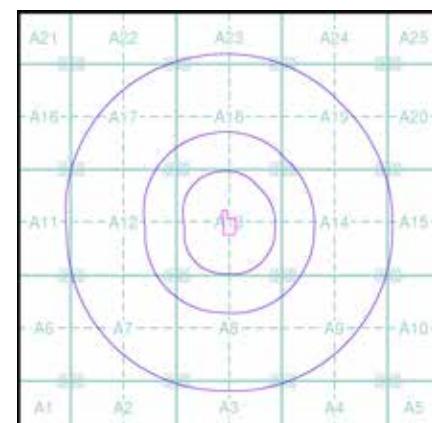
### Modelled Flood Depth



### Contours (height in metres)



## JBA 100 Year Return Flood Map (Undefended) - Slice A

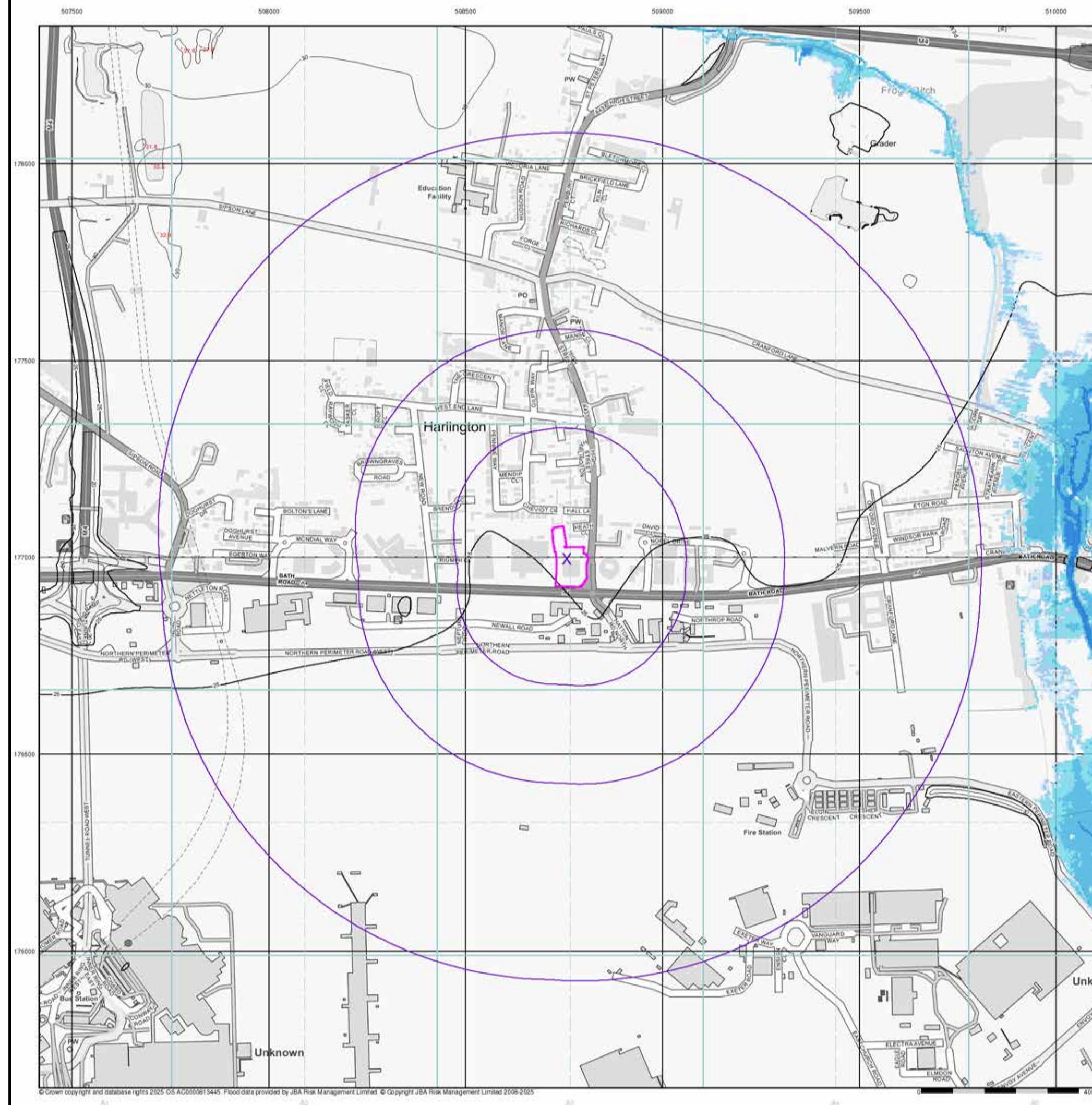


### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN



## JBA 200 Year Return Flood Map (Undefended) (1:10,000)

### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

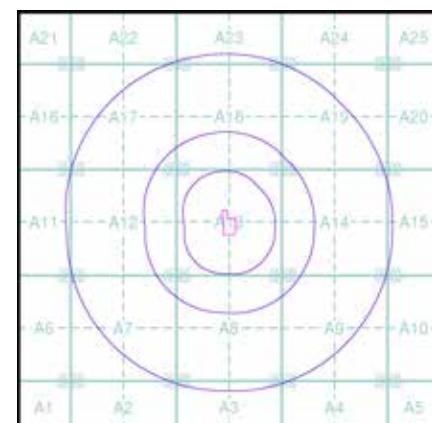
### Modelled Flood Depth

Pluvial Depth	Fluvial Depth	Coastal Depth
0.1m	0.01m - 0.05m	0.01m - 0.05m
0.1m - 0.3m	0.05m - 0.1m	0.05m - 0.1m
0.3m - 1m	0.1m - 0.3m	0.1m - 0.3m
>1m	0.3m - 1m	0.3m - 1m
	>1m	>1m

### Contours (height in metres)

Standard Contour — 105 — 100 — 95 —  
 Master Contour — 105 — 100 — 95 —  
 Spot Height \*167.8

## JBA 200 Year Return Flood Map (Undefended) - Slice A

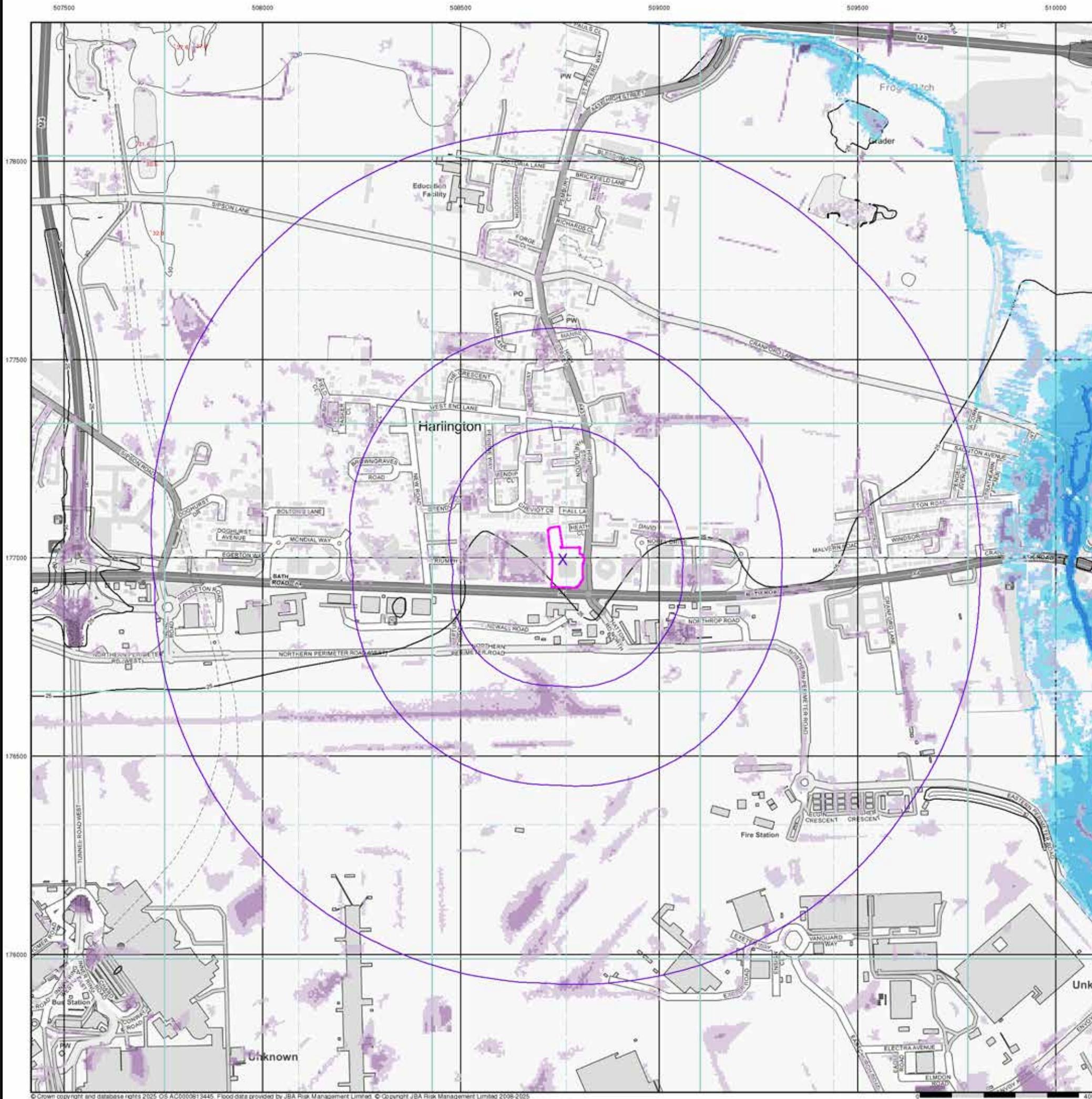


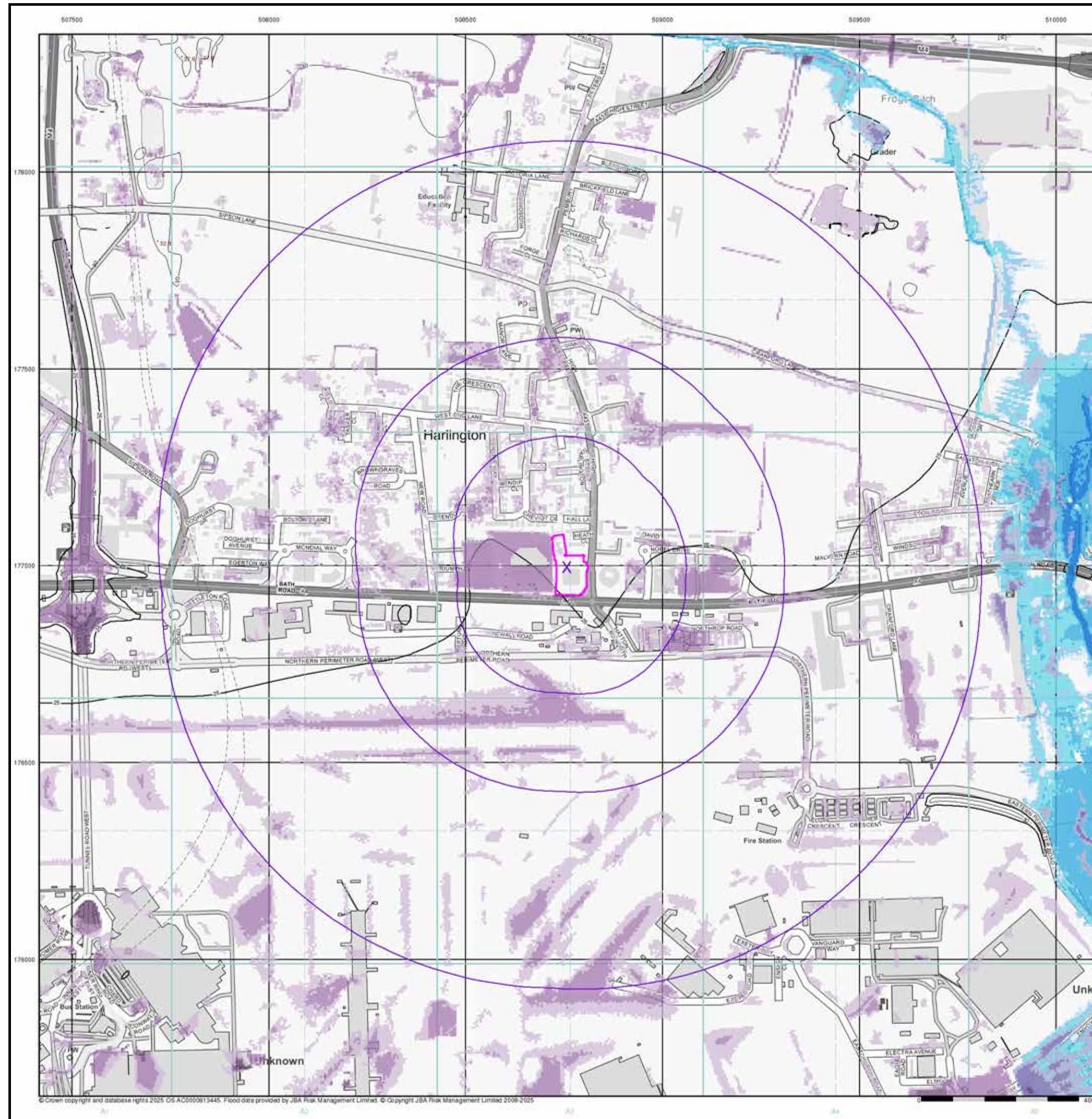
### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN





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**JBA 1000 Year Return Flood Map (Undefended) (1:10,000)**

**General**

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

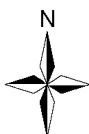
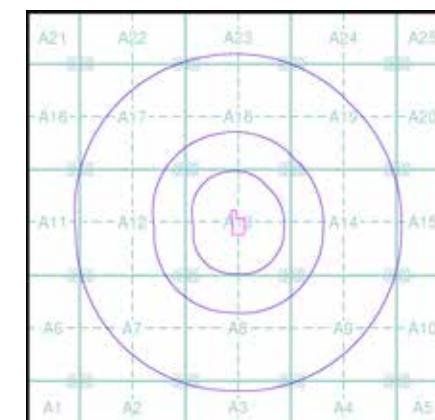
**Modelled Flood Depth**

Pluvial Depth	Fluvial Depth	Coastal Depth
0.1m	0.01m - 0.05m	0.01m - 0.05m
0.1m - 0.3m	0.05m - 0.1m	0.05m - 0.1m
0.3m - 1m	0.1m - 0.3m	0.1m - 0.3m
>1m	0.3m - 1m	0.3m - 1m
	>1m	>1m

**Contours (height in metres)**

- Standard Contour (105, 100, 95)
- Master Contour
- Spot Height (167.8)
- MLW - Mean Low Water
- MHW - Mean High Water

**JBA 1000 Year Return Flood Map (Undefended) - Slice A**



**Order Details**

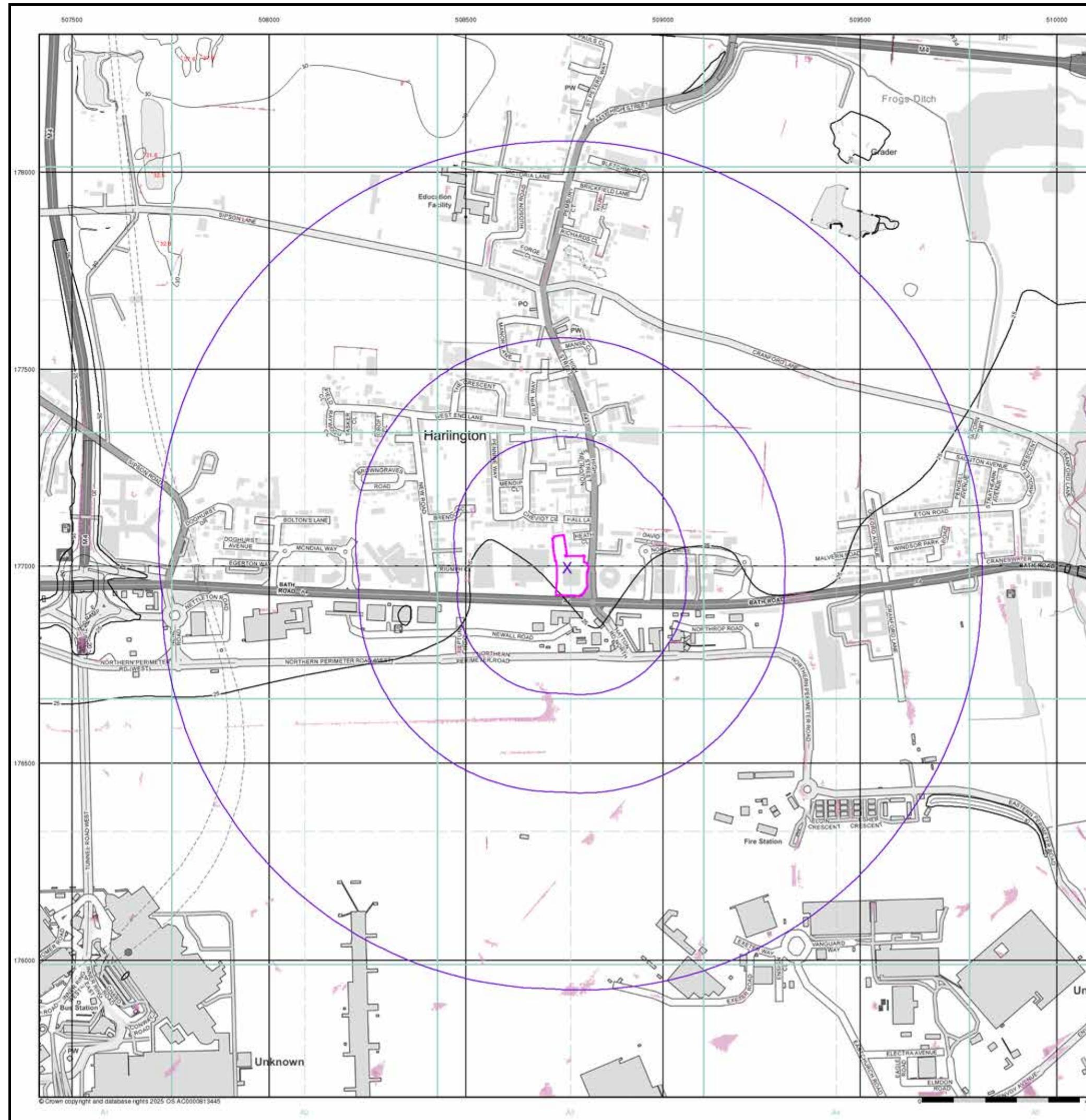
Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

**Site Details**

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN

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EA/NRW Surface Water 30 Year Return Depth Map (1:10,000)

#### General

Specified Site (pink square)

Specified Buffer(s) (purple circle)

Bearing Reference Point (purple 'X')

#### Surface Water Depth

0 - 0.15m

0.15 - 0.30m

0.30 - 0.60m

0.60 - 0.90m

0.90 - 1.20m

> 1.20m

#### Contours (height in metres)

Standard Contour

Master Contour

Spot Height

MLW - Mean Low Water

MHW - Mean High Water

167.8

#### Suitability

See the suitability map below

National to county

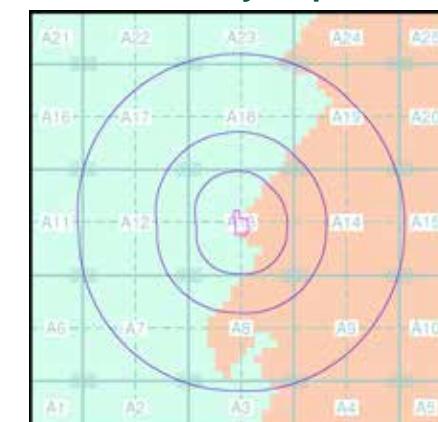
County to town

Town to street

Street to parcels of land

Property

#### EA/NRW Suitability Map - Slice A



#### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

#### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN

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## EA/NRW Surface Water 100 Year Return Depth Map

### General

Specified Site  Specified Buffer(s) 

Bearing Reference Point 

### Surface Water Depth

0 - 0.15m  
0.15 - 0.30m  
0.30 - 0.60m  
0.60 - 0.90m  
0.90 - 1.20m  
≥ 1.20m

### Contours (height in metres)

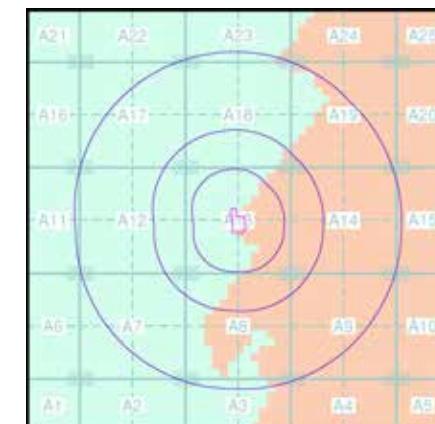
Standard Contour ~105  
Master Contour 100, 95  
Spot Height \*167.8  
MLW Mean Low Water  
MHW Mean High Water

### Suitability

See the suitability map below

National to county  Street to parcels of land  
County to town  Property  
Town to street 

## EA/NRW Suitability Map - Slice A

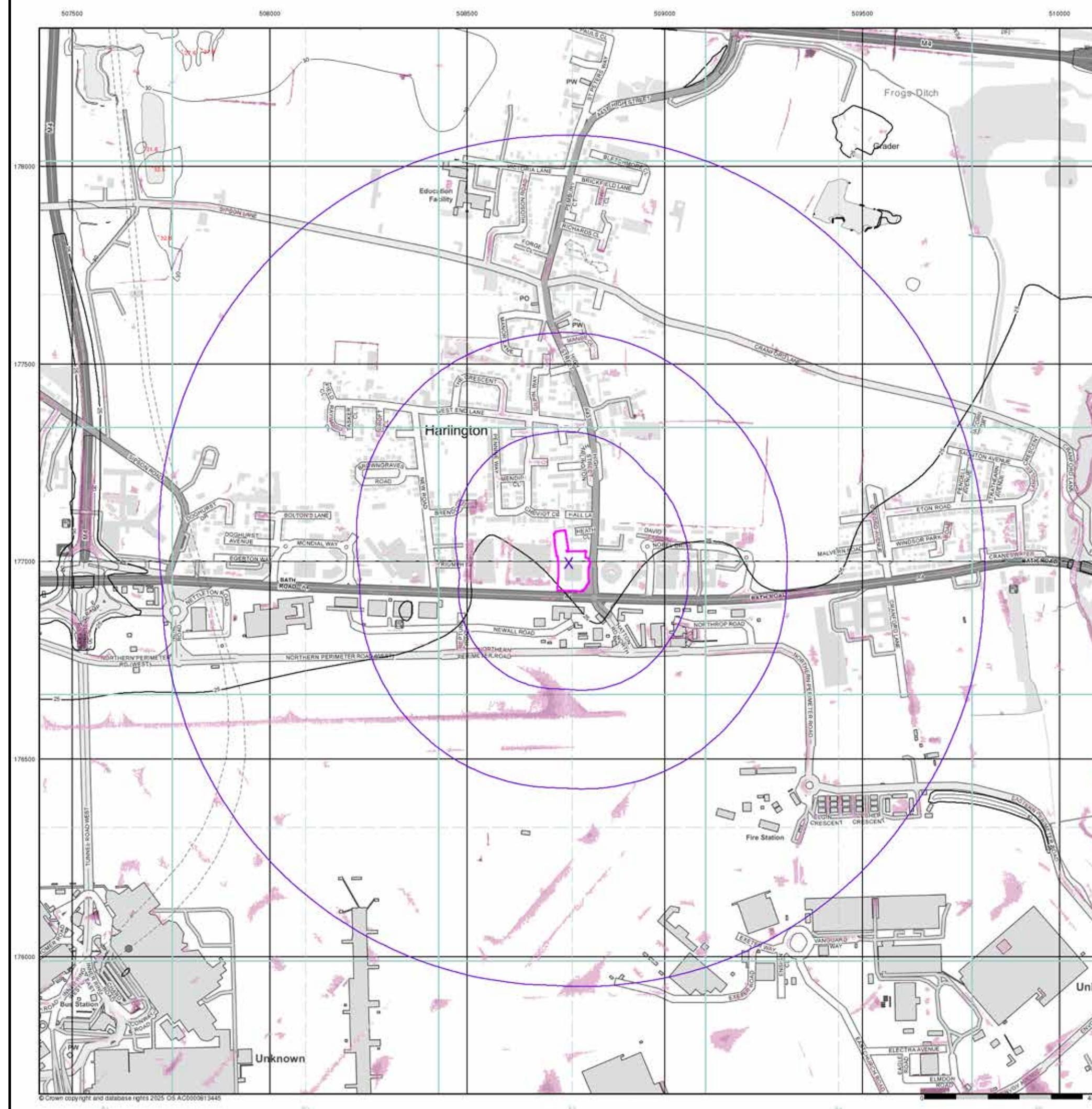


### Order Details

Order Number: 391391235\_1\_1  
Customer Ref: 1236 - Toyoko Inn  
National Grid Reference: 508760, 177000  
Slice: A  
Site Area (Ha): 0.92  
Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN



## EA/NRW Surface Water 1000 Year Return Depth Map (1:10,000)

### General

Specified Site Specified Buffer(s)

Bearing Reference Point

### Surface Water Depth

0 - 0.15m  
0.15 - 0.30m  
0.30 - 0.60m  
0.60 - 0.90m  
0.90 - 1.20m  
≥ 1.20m

### Contours (height in metres)

Standard Contour  
Master Contour  
Spot Height 167.8

MLW Mean Low Water  
MHW Mean High Water

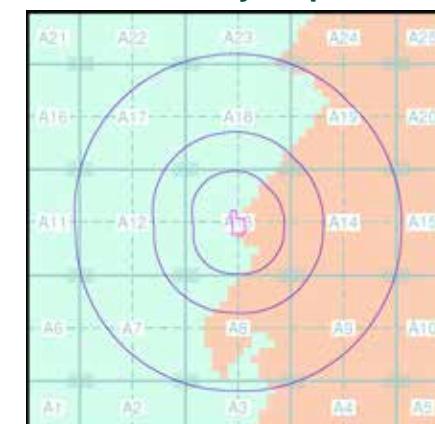
### Suitability

See the suitability map below

National to county  
County to town  
Town to street

Street to parcels of land  
Property

## EA/NRW Suitability Map - Slice A



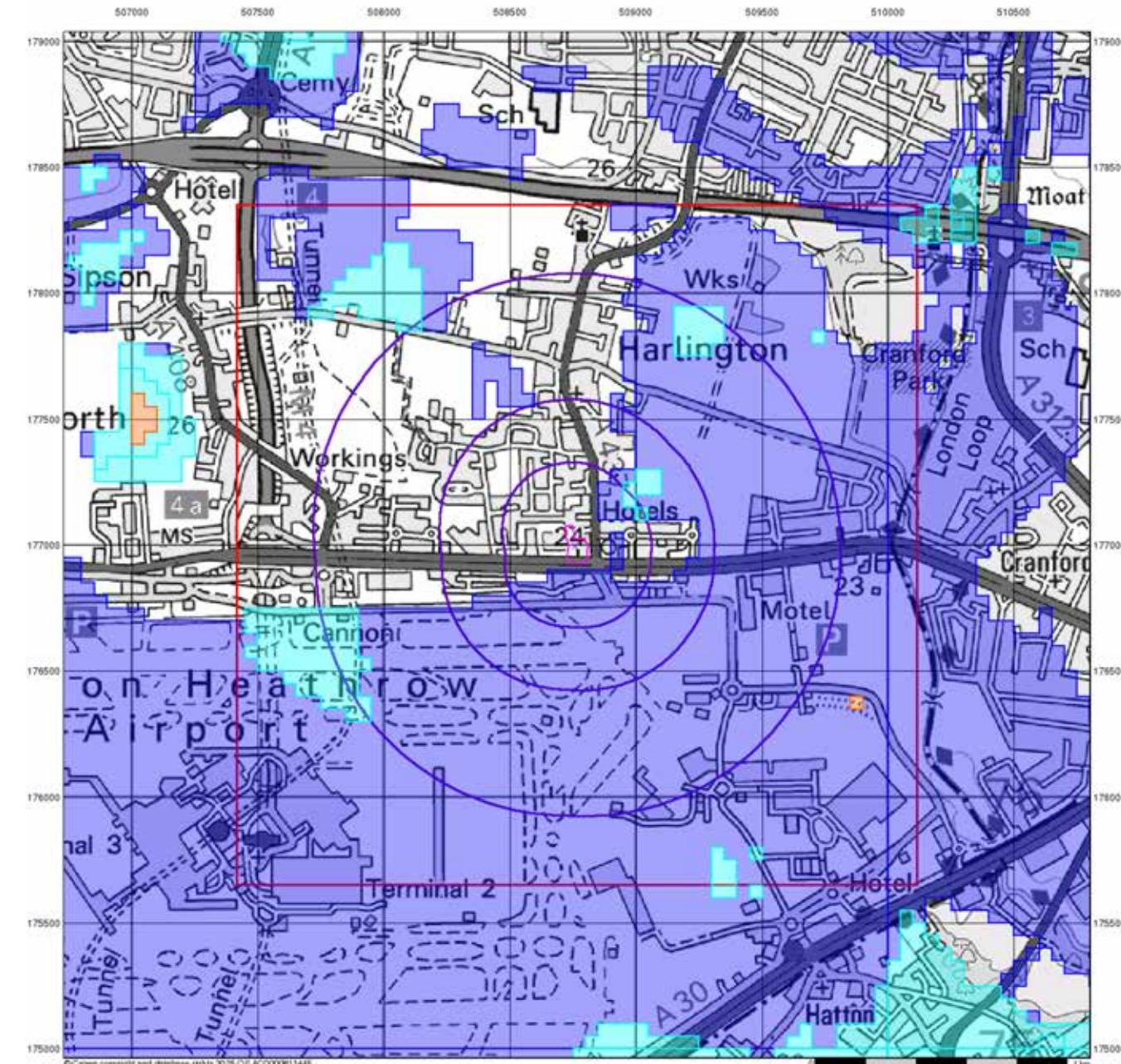
### Order Details

Order Number: 391391235\_1\_1  
Customer Ref: 1236 - Toyoko Inn  
National Grid Reference: 508760, 177000  
Slice: A  
Site Area (Ha): 0.92  
Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN





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### BGS Flood Data (1:50,000)

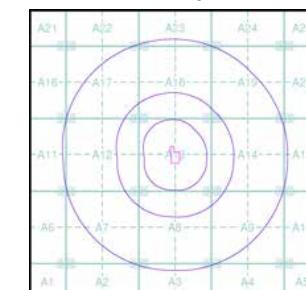
#### General

- Specified Site (Pink diamond)
- Specified Buffer(s) (Purple polygon)
- Bearing Reference Point (Purple circle)
- Slice (Red rectangle)
- Map ID (Grey box)

#### BGS Groundwater Flooding Susceptibility

- Potential for Groundwater Flooding to Occur at Surface (Purple)
- Potential for Groundwater Flooding of Property Situated Below Ground Level (Teal)
- Limited Potential for Groundwater Flooding to Occur (Orange)

#### BGS Flood Data Map - Slice A



#### Order Details

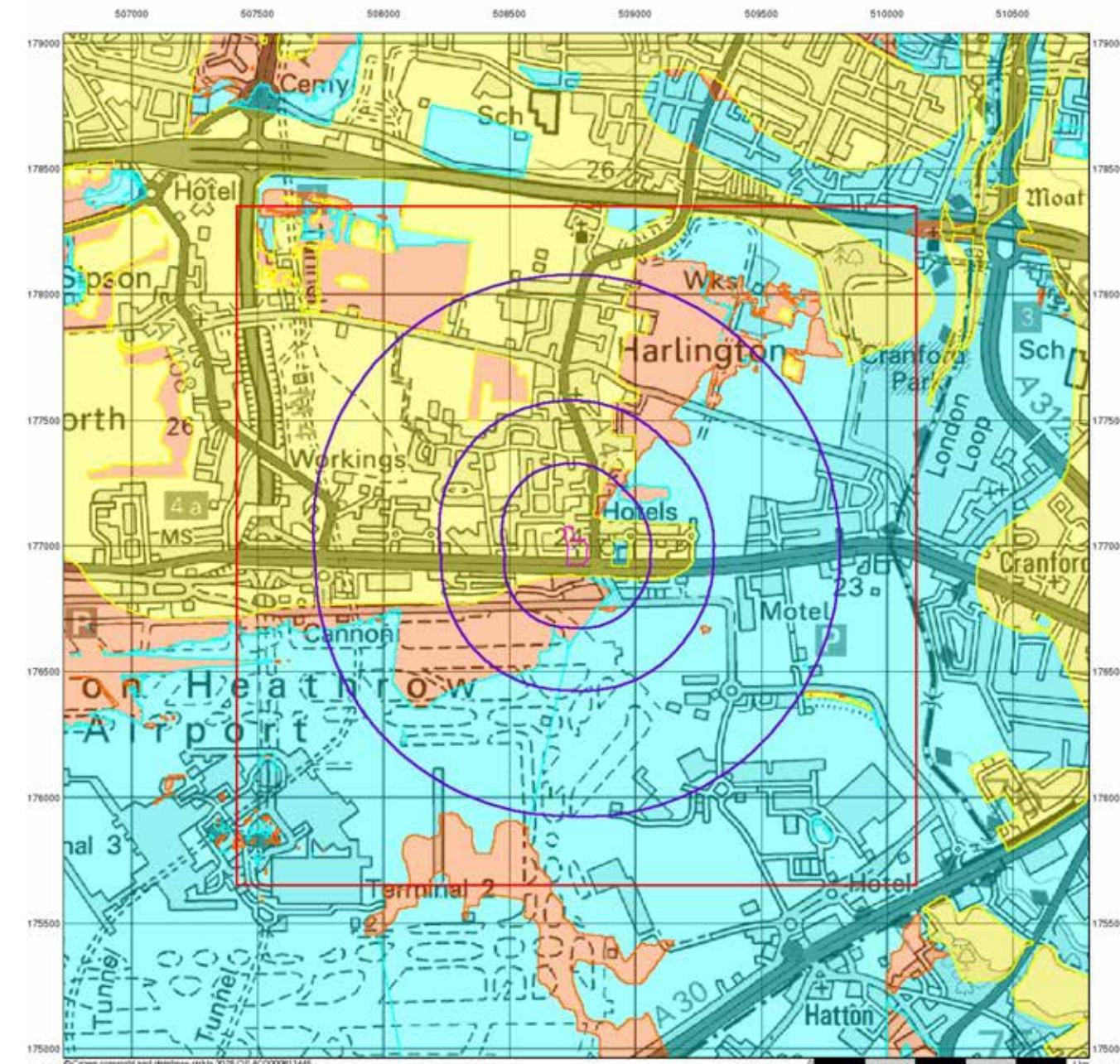
Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

#### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN

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## GeoSmart Information Groundwater Flood Map (1:50,000)

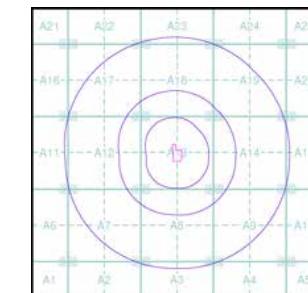
### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Slice

### GeoSmart Information Groundwater Flooding Risk

- High Risk
- Moderate Risk
- Low Risk
- Negligible Risk

## GeoSmart Information Groundwater Flood Map - Slice A



### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN

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## JBA Canal Failure Map (1:10,000)

### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point

### Flood Data

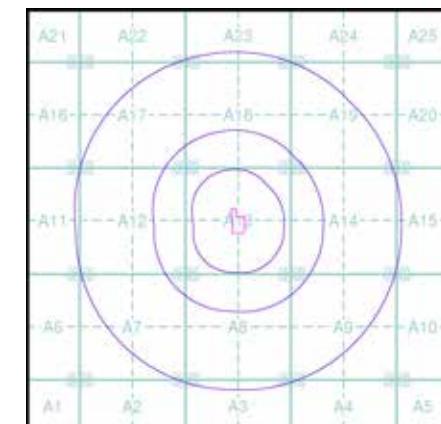
- Canal Failure
- Coverage

### Contours (height in metres)

- Standard Contour
- Master Contour
- Spot Height

MLW Mean Low Water  
MHW Mean High Water  
105  
100  
95  
167.8

## JBA Canal Failure Flood Map - Slice A

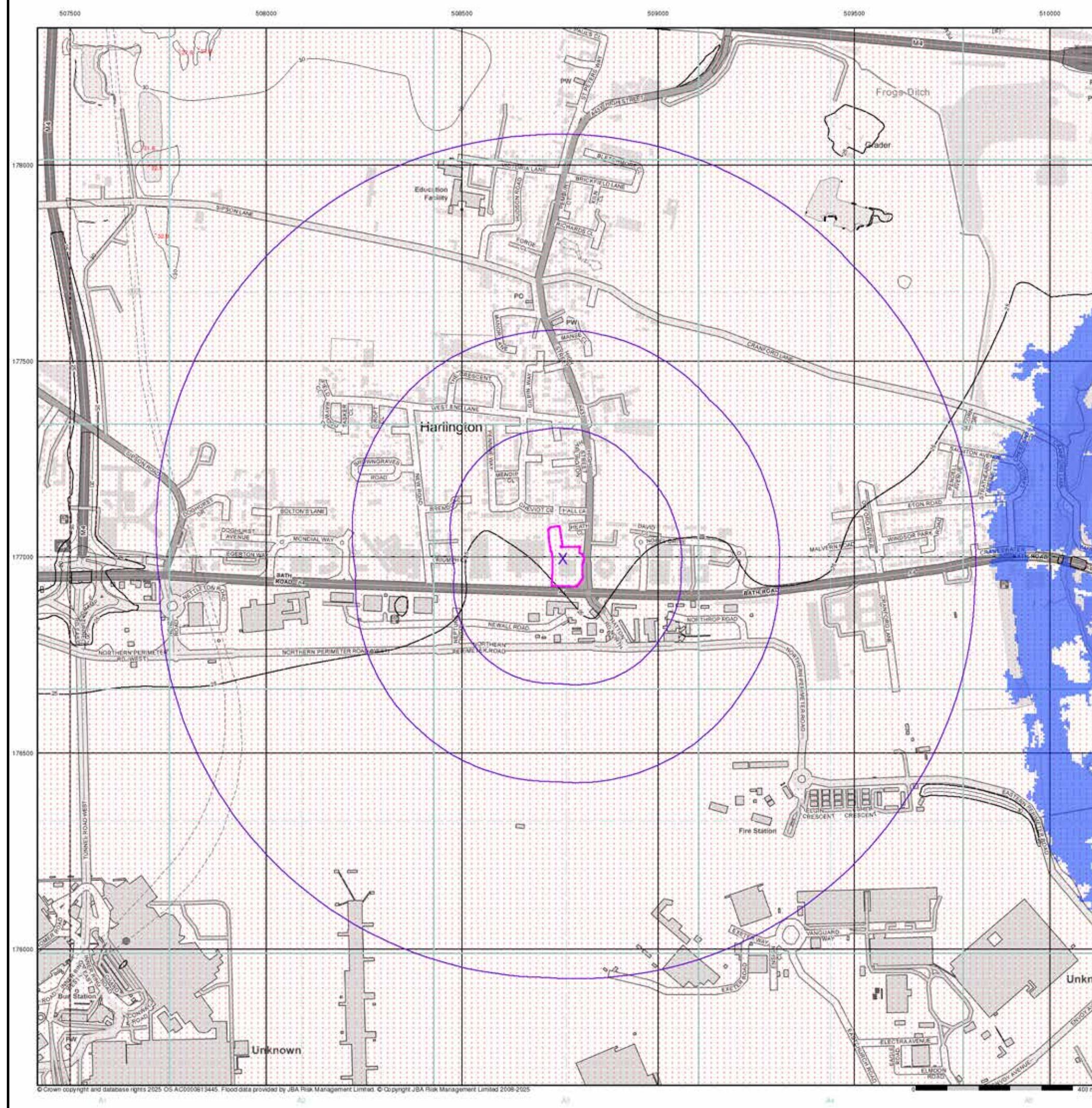


### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN



## EA/NRW Historic Flood Map (1:10,000)

### General

- Specified Site
- Specified Buffer(s)
- Bearing Reference Point
- Map ID

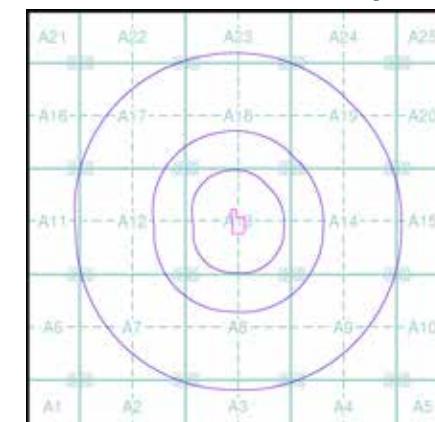
### Historic Flood Events Data

■ Channel Capacity Exceeded (no raised defences)	■ Obstruction/Blockage - Culvert
■ Channel Capacity Exceeded /Surface Water	■ Obstruction/Blockage - Debris Screen
■ Groundwater/High Water Table	■ Operational Failure/ Breach of Defence
■ Local Drainage/Surface Water	■ Other
■ Mechanical Failure	■ Overtopping of Defences
■ Obstruction/Blockage - Bridge	■ Surface Water
■ Obstruction/Blockage - Channel	■ Unknown
■ Historical Flood Liabilities	

### Contours (height in metres)

Standard Contour — 105  
 Master Contour — 100  
 Spot Height \* 167.8  
 MLW — Mean Low Water  
 MHW — Mean High Water

## EA/NRW Historic Flood Map - Slice A



### Order Details

Order Number: 391391235\_1\_1  
 Customer Ref: 1236 - Toyoko Inn  
 National Grid Reference: 508760, 177000  
 Slice: A  
 Site Area (Ha): 0.92  
 Search Buffer (m): 1000

### Site Details

Capital Place, 120, Bath Road, Harlington, Hayes, UB3 5AN

