



Planning Statement



Client Name: Toyoko Inn Co., Ltd
Site Address: Capital Place, 120 Bath Road,
Heathrow, UB3 5AN
Date: December 2025



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SECTION 1

Introduction



1.0 Introduction

1.1.1 This Planning Statement has been prepared on behalf of the Applicant, Toyoko Inn Co., Ltd, in support of a planning application for the proposed change of use from offices (Class E) to a 206-bed hotel (Class C1). The scheme includes an infill extension at the south-east corner of the site, providing an additional 640 sqm of hotel accommodation. A series of internal and external enhancements are proposed to deliver a visually distinctive, high-quality hotel designed to serve the Heathrow market.

1.1.2 The scheme has been developed following pre-application engagement. Written advice was received on 23 September 2025, subsequent to a meeting held on 6 August 2025. The design has been refined to address the feedback provided at the pre-application stage, including the additional requirements identified within the Sequential Test.

1.1.3 This Planning Statement outlines the planning merits of the proposal through a detailed assessment of relevant national and local planning policies, together with other material considerations. It should be read in conjunction with the accompanying plans and supporting documentation.

1.1.4 Accordingly, the description of development for the site is as follows:

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.

1.2 The Application Package

1.2.1 This Statement should be read alongside the other drawings and documents submitted in support of this application, comprising the following:

- Application Form and Certificates;
- CIL Form 1;
- Site Location and Block Plan, prepared by SHR Studio;
- Existing and Proposed Drawings, prepared by SHR Studio;
- Design and Access Statement (incorporating Accessibility), prepared by SHR Studio;
- Landscape Plans and Strategy, prepared by Re-Form;
- Planning Statement, prepared by CarneySweeney;
- Sequential Test, prepared by CarneySweeney;
- Consolidated Marketing Report, prepared by DeSouza and Colliers, collated by CarneySweeney;
- Hotel Needs Assessment, prepared by Colliers;
- Air Quality Assessment, prepared by Charles Andrews;



- Archaeological Desk Based Assessment, prepared by TCMS;
- Flood Risk Assessment and Drainage, prepared by Flo;
- Preliminary Ecology Assessment and Biodiversity Net Gain, prepared by Flo;
- Energy and Sustainability Statement, prepared by Charles Andrews;
- Overheating Assessment, prepared by Charles Andrews;
- Fire Statement, prepared by MU Studio;
- Noise Assessment, prepared by Noise Solutions;
- Transport Assessment including swept path drawings, prepared by i-Transport;
- Travel Plan, prepared by i-Transport;
- Parking Design and Management Plan, prepared by i-Transport;
- Service and Delivery Plan, prepared by i-Transport;
- Tree Survey and Arboricultural Report, prepared by Crown;
- Phase 1 Contaminated Land Assessment, prepared by Merebrook;
- Waste Management Strategy, SHR Studio.



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SECTION 2

The Site and Surroundings



2.0 The Site and Surroundings

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

2.1.2 The property has not contained a fee paying tenant since 2020, around which time an extensive marketing campaign has been undertaken to secure a tenant for continued use. The property is being used by Toyoko Inn Co., Ltd for administrative, back of house and office functions, in accordance with the lawful planning use of the site.

2.1.3 The surrounding area is predominantly commercial in nature, characterised by a variety of business and hotel developments. Heathrow Airport lies directly to the south of the site, across the A4, whilst residential properties are located to the north of the site. There are a number of hotel uses situated nearby, and the Sheraton Skyline Hotel is located directly to the west.

2.1.4 According to the Local Plan Policies Map, the site is located in the urban area, within the Heathrow Opportunity Area and within an archaeological priority zone. To the south of the site is the Heathrow Boundary, with Public Safety Zone to the south east of the site. Beyond the existing built form, to the north east of the site is the Green Belt. There is a Tree Preservation Order Area which covers the site (ref: TPO 29), known as The Hall, High Street, Harlington which was designated on 1st July 1957, **Figure 1** below shows the extent of the Tree Preservation Order Area, which extends to the north of the site.



Figure 1: Extract to show extent of TPO Area which covers the Site

2.1.5 The site is within Flood Zone 1 and is not at risk of surface water flooding.



- 2.1.6 The site is located within an accessible location, with a PTAL Rating of 4. The site is within walking distance of a number of bus stops along Bath Road, providing regular services to a range of destinations including, Ruislip, Hounslow, Greenford, Kingston, Slough, Heathrow Airport and Uxbridge. Despite the site being conveniently located to Heathrow, the site and wider area is outside of the Heathrow Perimeter Area and outside of a designated town centre.
- 2.1.7 The site does not contain any Listed Buildings, and there are no heritage assets within close proximity of the site.



SECTION 3

Planning History



3.0 Planning History

3.1 The Site

3.1.1 The relevant planning history for the site is set out below, which includes the pre-application feedback received on this proposal.

Council Reference: 36728/PRC/2025/89 – Change of Use from office premises (Class E) to a hotel (Class C1), incorporating a rooftop extension, internal and external building alterations, parking reconfigurations and provision.

3.1.2 A meeting took place on 06.08.2025 and written feedback was received on 23.09.2025.

3.1.3 The pre-application process confirmed that the principle of development was acceptable, with officers noting that the loss of office space would not be objectionable. At this stage, marketing reports prepared by Colliers and Desouza were submitted. Officers advised that the planning application should be supported by a single consolidated marketing document, bringing together all evidence into one comprehensive report. This consolidated report accompanies the current submission.

3.1.4 The Council's subsequent pre-application letter confirmed that the marketing evidence "*collectively supports the case that the building is no longer fit for its current purpose. More importantly, as the other policy exceptions have been satisfied, the loss of the office space is not objected to.*" On this basis, officers accepted the principle of the loss of office floorspace.

3.1.5 In relation to the proposed hotel use, officers raised no fundamental objection, acknowledging the sustainable location of the site and its suitability for hotel accommodation serving Heathrow, given the prevalence of hotels in the surrounding area. Notwithstanding the site's excellent location for Heathrow access, the Council requested further details on the Sequential Test to demonstrate compliance with policy requirements for main town centre uses in out-of-centre locations. An updated Sequential Test is therefore submitted with the application.

3.1.6 The pre-application response also provided detailed design feedback on the two options presented. Officers advised that any new entrance should be visually integrated, clearly legible, and easy to locate, and that the overall appearance of the building should be recognisably that of a hotel rather than an office. It was noted that a light-touch retrofit would be unlikely to deliver a building of sufficient quality for hotel use. The designs have since been updated to reflect these comments.

3.1.7 No concerns were raised in respect of neighbouring amenity. The nearest residential property lies approximately 50 metres to the north, and officers confirmed that the proposed works would not result in harm to outlook, daylight, or privacy for neighbouring occupiers. With regard to car parking, officers accepted the proposed reduction relative to the existing office use. They requested, however, that effective dedicated drop-off areas should be provided for taxis and coaches. In addition, the applicant is



required to submit a Service and Delivery Plan (including swept path drawings), a Parking Design and Management Plan, and a Travel Plan. These are provided with the planning application.

3.2 Surrounding Area

Axis House, 242 Bath Road

Council Reference: **43794/APP/2018/2779** – *erection of a 6-storey 157-bedroom hotel including plant room on the roof, the excavation of a basement to provide car parking and associated landscaping. Application Approved 19.02.2019.*

- 3.2.1 The justification for this approval was based on the site's location within the Heathrow Opportunity Area, where the northern section is expected to continue to support airport-related uses, including hotels.
- 3.2.2 The planning justification further notes that the principle of development was established through an earlier approval, which is outlined below.

Council Reference: **APP/2017/3704** – *erection of a 5-storey 128 bedroom hotel including the excavation of basement to provide 50 car parking and associated landscaping. Application Approved 05.12.2017.*

- 3.2.3 The Officers Report noted that the site is located within the Heathrow Opportunity Area. Given the general support for additional hotel accommodation, particularly budget accommodation in outer London, no objection was raised in relation to the principle of development.
- 3.2.4 The general design, height, size and massing of the proposed building addressed previous concern raised by Officers. Thus, it was not considered that the proposal would result in any harm to the street scene or neighbouring amenity. Ultimately, the scheme was considered acceptable and in accordance with the relevant planning policy.

Ariel Hotel, 118 Bath Road

Council Reference: **1126/APP/2023/3671** – *Reconfiguration, alteration, and extension of existing hotel (providing additional hotel rooms) (Use Class C1), together with erection of a new apart-hotel building (Use Class C1) on car park land to the north. Application Validated 19.01.2024, awaiting determination.*

- 3.2.5 The proposal comprises the reconfiguration, alteration and extension of the existing hotel (providing additional hotel rooms).



SECTION 4

Proposal



4.0 Proposal

4.1 The Proposed Development

4.1.1 This section provides a summary of the application's proposals; full details are provided within the application drawings and in the Design and Access Statement prepared by SHR Studio, submitted in support of this application.

4.1.2 The application seeks planning permission for the change of use of the existing vacant office building (Class E) to a hotel (Class C1). The proposal incorporates a much enhanced entrance and a small infill extension at the south-eastern corner of the site, designed to provide a new, more legible address and additional hotel accommodation. This extension will deliver an additional 640 sqm (GIA) of hotel accommodation and ensure the building presents as a complete four-storey structure. This also includes the 102sqm new projection over the entrance.

4.1.3 The proposals include the installation of new glazing throughout and essential repairs to the existing building fabric. The internal layout will largely retain the current "doughnut" configuration, comprising a central covered courtyard surrounded by rooms positioned along either side of the main corridor. In total, the redevelopment will deliver approximately 6,528 sqm (GIA) of hotel floorspace.

4.1.4 The scheme involves internal reconfiguration across all floor levels to accommodate 206 hotel bedrooms, together with a range of ancillary facilities. These include a spacious entrance and reception lobby, bar and breakfast area, gym, meeting rooms, and co-working space. In addition, a small ground-floor retail unit is proposed to provide guests with essential convenience items, snacks, and refreshments. Out of the 206 rooms, 21 will be accessible and these are located across ground, 1st, 2nd, 3rd floors.

4.1.5 In addition, 20 rooms will be windowless, however, they will be supported by mechanical ventilation and appropriate heating and cooling measures to ensure there are no adverse impacts.

4.1.6 The proposed external alterations aim to redefine the building's appearance for its new hotel use and to enhance its overall legibility, particularly at the main entrance. All existing windows will be replaced with PPC aluminium frames to provide a contemporary and durable finish.

4.1.7 The facade strategy introduces lightweight, shoji-inspired screening elements, arranged in a consistent rhythm across all elevations. The screens are proposed to be replicating on every elevation.

4.1.8 The entrance will be significantly enhanced through the addition of a double-height glazed enclosure. This feature will incorporate vertical fins and contemporary detailing to reinforce the building's modern character. Both the fins and the facade screens will be constructed from cement board finished in a hessian tone.

4.1.9 Access and circulation within and around the building will remain unchanged. Existing on-site car parking will be retained for hotel use, but reconfigured to accommodate servicing requirements, coach parking,



and dedicated vehicle drop-off areas. The proposals include 152 no. car parking spaces which is a reduction in 47 spaces. The proposals include taxi and coach drop off bays.

4.1.10 With regard to landscaping, the proposals aim to enhance the arrival experience into the site by improving sightlines from the footpath entrance at the southeastern corner. The footpath will be realigned, opened up and upgraded with new lighting, signage, and entrance features, including additional tree planting. The best trees on site will be retained, with new low-level planting and shrubs introduced throughout. The scheme also incorporates formal seating nooks set within new planting, enhanced buffer zones around the buildings, and the planting of key feature trees at prominent corners.

Planning Benefits

4.1.11 The proposal will deliver a range of key planning benefits, as follows:

- The proposals will replace the underutilised office building with a high-quality, viable hotel that serves the Heathrow market. The scheme will ensure the property is brought into viable use, introducing activity and vitality to the site and the wider area.
- The proposals will substantially improve the appearance of the existing building and site, delivering a hotel with a high-quality design and appearance that contributes positively to its immediate surroundings and enhances the wider townscape.
- The development will revitalise the site and contribute positively to the local economy by generating significant employment opportunities through hotel operations. It is anticipated that Toyoko Inn will employ approximately 59 staff, providing both direct jobs and wider economic benefits to the community.
- The proposals will deliver meaningful public realm enhancements and landscape improvements, enhancing urban greening and achieving biodiversity net gains. The scheme will open the site, improve the legibility of the building, and create a more accessible and attractive environment for users of the hotel.
- Sustainable design and construction measures will be utilised including adopting a fabric first approach with enhanced fabric performance, highly efficient ASHP systems, mechanical ventilation systems with low specific fan power and heat recovery.



SECTION 5

Relevant Planning Policy



5.0 Relevant Planning Policy

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, in the determination of planning applications, decisions are made in accordance with the Development Plan unless material planning considerations indicate otherwise. The Development Plan comprises the following documents:

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

5.2 The London Plan

5.2.1 The relevant policies from the London Plan are summarised below.

5.2.2 **Policy D3:** Optimising Site Capacity through the Design-Led Approach which confirms all development must make the best use of land following a design led approach that optimises the capacity of sites. Proposals must enhance local context, encourage and facilitate active travel, include clearly defined public and private environments, and facilitate efficient servicing and maintenance.

5.2.3 **Policy E1:** Offices confirms that the redevelopment, intensification and change of use of surplus office space to other uses is supported, providing affordable workspace and re-using large office space for smaller office units has been explored. For surplus office space where there is no reasonable prospect of being used for business purposes, evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing for at least 12 months.

5.2.4 **Policy E10:** Visitor Infrastructure which confirms London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions. It confirms that a sufficient supply and range of serviced accommodation should be maintained. It states that in outer London, serviced accommodation should be promoted in town centres and Opportunity Areas, where they are well connected to public transport, particularly to central London.

5.2.5 **Policy T6.4:** Hotel and Leisure Uses Parking where in 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.

5.2.6 **Policy SD1:** Opportunity Areas: states that boroughs should support development that creates employment opportunities and contribute to regeneration objectives.

5.2.7 **Policy D12:** Fire: states that all developments need to ensure the highest possible fire safety standards.



5.3 The Hillingdon Local Plan Part 1: Strategic Policies

5.3.1 The Local Plan Part 1 was adopted in November 2012 and sets out the strategic policies for the Borough. The relevant policies are outlined below.

5.3.2 **Policy BE1:** Built Environment confirms the Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. Buildings should achieve high quality design, be appropriate to the identity and context of local buildings and improve the quality of the public realm creating safe and secure environments.

5.3.3 **Policy E1:** Managing the Supply of Employment Land where the Council will accommodate growth by protecting Strategic Industrial Locations and the designation of Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Locations.

5.3.4 **Policy EM7:** Biodiversity and Geological Conservation which confirms the Council will seek the provision of biodiversity improvements from all developments, where feasible, including the use of sustainable drainage systems that promote ecological connectivity and natural habitats.

5.3.5 **Policy HE1:** Heritage: states that the Council will conserve and enhance Hillingdon's heritage assets include Archaeological Priority Zones.

5.3.6 **Policy T1:** Accessible Local Destinations: The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network.

5.4 The Hillingdon Local Plan Part 2: Development Management Policies, Site Allocations and Designations

5.4.1 The Local Plan Part 2 was adopted in January 2020 and provides detailed policies that will form the basis of Council's decisions on planning applications. The relevant policies are outlined below.

5.4.2 **Policy DME2:** Employment Uses Outside of Designated Sites confirms that proposals which involve the loss of employment floorspace will normally be permitted if

- i) The existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or
- ii) The site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or
- iv) The new use will not adversely affect the functioning of any adjoining employment land; or
- v) The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan.



5.4.3 **Policy DME5:** Hotels and Visitor Accommodation confirms the Council will support a range of visitor accommodation, conference and related uses in accessible locations subject to:

- i) A high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and the streetscape;
- ii) Provision of an accessible layout and rooms in accordance with Policy DME6: Accessible Hotels and Visitor Accommodation; and
- iii) No adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion.

5.4.4 **Policy DME6:** Accessible Hotels and Visitor Accommodation which confirms for proposals of 10 or more rooms the Council will require 10% of hotel rooms to meet wheelchair accessibility standards.

5.4.5 **Policy DMHB11:** Design of New Development confirms all development will be required to be designed to the highest standards and incorporate good principles of design. Proposals must harmonise with local context, ensure the high quality of buildings and materials, and include landscaping and tree planting to protect amenity.

5.4.6 **Policy DMHB12:** Streets and Public Realm confirms all development should be well integrated with the surrounding area and accessible. It should improve legibility, ensure public realm design takes account of the established townscape, include landscaping, provide safe pedestrian and cycle movements on site, incorporate robust hard landscaping, and incorporate principles of inclusive design.

5.4.7 **Policy DMHB14:** Trees and Landscaping states all developments will be expected to retain or enhance existing landscaping and trees. Planning applications for proposals that would affect existing trees are required to provide a tree survey and arboricultural method statement to show how the trees will be protected. Where the trees are to be removed, replanting must be provided on site, or include contributions off-site.

5.4.8 **Policy DME1:** Living Walls and Roofs and on-site Vegetation confirms all developments should incorporate living roofs and/or walls into the development. Suitable justification should be provided where this cannot be provided.

5.4.9 **Policy DMEI 2:** Reducing Carbon Emissions: expects all developments to make the fullest contribution to missing carbon dioxide emissions in accordance with London Plan targets.

5.4.10 **Policy DMEI 7:** Biodiversity Protection and Enhancement: requires all new development to retain and enhance any existing features of biodiversity value.

5.4.11 **Policy DMT 1:** Managing Transport Impacts: expects all proposals to meet the transport needs of the development and address transport impacts, including being accompanied by a Travel Plan where necessary.



- 5.4.12 **Policy DMT 2:** Highways Impacts: development proposals must ensure that safe and efficient vehicular access to the highway network is provided and that the proposal do not contribute to the deterioration of air quality, noise or local amenity.
- 5.4.13 **Policy DMT 5:** Pedestrians and Cyclists: requires development proposals to ensure that safe and inclusive access for pedestrians and cyclists is provided. Cycle Parking is to be provided in accordance with Appendix C.
- 5.4.14 **Policy DMT 6:** Vehicle Parking: development proposals must comply with parking standards in Appendix C. The Standards are based on those contained in the London Plan.

5.5 National Planning Policy Framework (2024)

- 5.5.1 The National Planning Policy Framework (2024) comprises a material planning consideration, and should be afforded weight.
- 5.5.2 The revised NPPF was published in December 2024 and updated in February 2025.
- 5.5.3 Chapter 7 refers to 'Ensuring the Viability of Town Centres' and Paragraph 91 confirms that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses which are neither 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 no available should out of centre sites be considered.
- 5.5.4 Paragraph 11 refers to the presumption in favour of development. For decision-making, this means approving development proposals that accord with an up-to-date development plan without delay, or where there are no relevant development plan policies, or these policies are out of date, permission should be granted unless the adverse impact of doing so would significantly and demonstrably outweigh the benefits.
- 5.5.5 Paragraph 124 confirms that decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment ensuring safe and healthy living conditions.
- 5.5.6 Paragraph 125(c) confirms that substantial weight should be given to the value of using brownfield land within settlements for homes and other identified needs.
- 5.5.7 Paragraph 128 confirms that authorities should take a positive approach to applications for alternative uses of land which is currently developed by not allocated for a specific purpose in plans, where this would help meet identified needs.

Chapter 12 refers to Delivering Good Design, and highlights the importance of delivering good design, particularly in achieving sustainable development. Paragraph 139 confirms that development which is not well-designed should be refused.



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SECTION 6

Planning Assessment



6.0 Planning Assessment

6.1.1 The following section discusses the material planning considerations relevant to this proposal. It demonstrates how the proposal would comply with the Development Plan and the other material planning considerations.

6.2 Principle of Development

6.2.1 The principle of development for this proposal can be split into two key considerations; the loss of the existing office floorspace and the provision of a hotel. These matters are discussed in turn below.

Loss of Office Floorspace

6.2.2 The existing building is a commercial office (Class E), and the proposals seek to change the use of the site to a hotel, which is proposed to serve Heathrow Airport. The site itself is located outside of a designated centre, and outside of the Heathrow perimeter area, therefore the proposal must accord with Policy DME2 of the Local Plan and Policy E1 of the London Plan.

6.2.3 Policy E1 of the London Plan confirms that existing viable office floorspace should be retained. It confirms that development proposals related to new and existing offices should consider the need for a range of suitable workspace, including lower cost and affordable workspace. However, it confirms that the redevelopment, intensification or change of use of surplus office to other uses is supported where there is no reasonable prospect of these being used for business purposes. It confirms that evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing for at least 12 months.

6.2.4 Local Plan Policy DME2 establishes the criteria for developments involving the loss of employment floorspace outside designated employment areas. The pre-application enquiry confirmed that satisfying any one of the exceptions outlined in Policy DME2 is sufficient to justify the loss of office use. In this case, however, multiple criteria under Policy DME2 are met, providing strong justification that the site is unsuitable for continued office use. The relevant provisions of Policy DME2 are set out below.

Proposals which involve the loss of employment floorspace or land outside designated employment areas will normally be permitted if:

- i) The existing use negatively impacts on the local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area, or*
- ii) The site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or*
- iii) Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes, or*
- iv) The new use will not adversely affect the functioning of any adjoining employment land, or*



- v) *The proposed use relates to specific land use allocation or designation identified elsewhere in the plan.*

6.2.5 As noted, satisfaction of any one of the conditions is sufficient to justify the loss of existing employment use outside a designated employment area.

6.2.6 It is further noted that the footnote to Part (iii) of Policy DME2 requires that adequate evidence must include details of site marketing over a minimum period of 12 months. The Marketing Overview submitted with the Planning Application, prepared by CarneySweeney, demonstrates compliance with this requirement. Moreover, the marketing evidence was provided to the Council at the pre-application stage. In its response (Ref. 36728/PRC/2025/89), the Council confirmed that the submitted marketing details “*collectively support the case that the building is no longer fit for its current purpose*” and concluded that, *as another policy exception has been satisfied, “the loss of the office space is not objected to.”*

6.2.7 For completeness, the strands of DME 2 are addressed to categorically confirm that the loss of the office is acceptable. In this case, at least three of the stands are met.

(i) the existing use negatively impact on local amenity, through distance to neighbours, visual intrusion or has an impact on the character of area.

6.2.8 The site is situated on the edge of the Heathrow Perimeter Area, one of the primary employment and growth hubs within the Borough. It also falls within the Heathrow Opportunity Area, which is designated for significant future development. Policy SD1 of the London Plan identifies Opportunity Areas as key locations with substantial development potential, particularly in conjunction with existing or prospective public transport enhancements. The surrounding area is predominantly characterised by commercial and hotel uses, reinforcing the site's compatibility with its broader context. The property itself fronts the A4 Bath Road network, a major arterial route providing critical connectivity between central London and Heathrow Airport.

6.2.9 Given these factors, the current use does not adversely impact local amenity, and therefore, the site remains suitable for employment-generating purposes. Additionally, the proposed hotel use aligns with the prevailing urban context and strategic policy objectives of Opportunity Areas, supporting continued economic growth. This is even more important following the proposed expansion of Heathrow.

6.2.10 As the area is predominantly commercial, the site's current use is well-integrated within its surroundings. Therefore, compliance against this strand is not possible as the office use would have been unlikely to affect the local amenity.

(ii) the site is unsuitable for employment reuse or development because of its size, shape, location or unsuitability of access

6.2.11 The property comprises 5,888 sqm of sub-standard office space, with a varied internal layout including meeting rooms and ancillary facilities such as showers, café areas, and tea points. Despite its poor



condition, it benefits from a PTAL rating of 4 (close to 6), offering strong public transport accessibility, as well as access via the existing road network and private vehicles.

- 6.2.12 The building is a conventional office structure with on-site car parking, however, it now requires significant upgrading. The supporting summary marketing report prepared by Colliers confirms that the property is in a deteriorated condition, with several floors stripped out and substantial capital investment required to bring it back into viable office use. While refurbishment could theoretically facilitate continued employment use, the local office market has not recovered in the post-COVID-19 environment, resulting in limited investor appetite for major redevelopment or refurbishment of secondary office stock.
- 6.2.13 This Colliers letter states that the Southeast occupational and investment markets remain weak, with occupancy at 12.9% and annual take-up below 2 million sq ft. They further note that one of the most significant constraints facing the office market is the high cost of refurbishing or developing space to Grade A standard. Given low yields and rental levels, returns on such investment are minimal, making refurbishment of this building for continued office use commercially unviable.

Therefore, the loss of office would comply with this condition.

Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes

- 6.2.14 Under this condition, marketing evidence must demonstrate the site's unviability for continued employment use, with no interest from potential occupiers. The accompanying footnote specifies that such evidence must include documentation of marketing efforts over at least 12 months.
- 6.2.15 The site has not had a formal rent paying tenant since 2020, during which time an extensive marketing campaign has been undertaken to secure a tenant for continued use. Active marketing efforts commenced in 2018 whilst a tenant was in situ, through property agent Desouza for lease and sales, followed by subsequent marketing by Colliers. Both agents have provided a summary of their marketing which is submitted in support of this application.
- 6.2.16 The property therefore has been subject to sustained and transparent marketing efforts since 2018, thereby clearly satisfying the requirements of Policy DME 2 in relation to demonstrating a lack of demand for continued employment use. This position is confirmed in the Council's pre application advice, which acknowledges that the evidence provided exceeds the 12-month threshold. No meaningful interest has been secured from office occupiers, underscoring the absence of demand for such use at this location.
- 6.2.17 As officers are aware, COVID-19 significantly impacted office demand due to remote work adoption, rising construction costs, extended void periods, rent-free incentives, and broader market risks, discouraging investor and occupier commitment. The only firm interest received has been from industrial developers, particularly in the post pandemic period, but subsequent market downturn in the industrial sector resulted in withdrawn offers or proposals at levels that were not commercially viable. The property is



currently being used by the Applicant for office and administrative functions, in accordance with the lawful planning use.

The new use will not adversely affect the functioning of any adjoining employment land

6.2.18 The proposed change of use to a hotel aligns with the area's existing character, which is predominantly defined by commercial and hotel developments, alongside the associated airport-related traffic. As the site is not situated within a designated employment area, the proposed new use is not anticipated to negatively impact the functioning of adjacent employment land. Therefore, the replacement of the office use with a hotel meets this condition.

The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan

6.2.19 The proposed new use is not allocated or is not designated at the site. Therefore, this condition would not be met.

Summary

6.2.20 The removal of the existing office use must demonstrate compliance with Policy DME2, which requires satisfaction of at least one of the five specified conditions. In this case, three of the five conditions are met. Most notably, clear evidence of sustained marketing efforts has been provided. The property has not had a rent paying tenant since 2020, however, formal marketing started before this time. The marketing significantly exceeds the policy's minimum 12-month marketing requirement. Together with the sustained decline in office demand in the post-COVID period and the substantial capital investment required to modernise the building, the site is demonstrably unviable for continued office use.

6.2.21 In light of this, the proposed change of use to a hotel represents a logical and sustainable alternative, one that aligns with the character of the surrounding area and is explicitly supported in principle by the Council's advice. The hotel use would not only secure the long-term future of the building but also contribute positively to the local economy, providing employment opportunities and enhancing the vitality of the area.

Provision of Hotel

6.2.22 Policy E10 of the London Plan refers to visitor infrastructure, which confirms a sufficient supply and range of serviced accommodation should be maintained. The policy provides clear strategic support for the provision of additional visitor accommodation outside the Central Activities Zone when there is good public transport access to central London and international and national transport termini. Policy E10 of the London Plan encourages the provision of circa 2,230 net additional hotel rooms per annum (Paragraph 6.10.2).

6.2.23 The site benefits from a PTAL rating of 4 and is situated near both local and national transport hubs. This aligns with the objectives of Policy E10, which supports the strategic optimisation of sites for hotel provision. Policy SD1 of the London Plan, which addresses Opportunity Areas, stipulates that development



within these areas should contribute to regeneration goals and maximise job creation. Specifically, Policy SD1 identifies the Heathrow Opportunity Area as a location expected to deliver 11,000 jobs.

- 6.2.24 Given that office use has been confirmed as unviable, the proposed conversion of the building into a hotel which is anticipated to generate approximately 59 jobs represents a meaningful contribution to employment growth. The scheme enhances visitor infrastructure, thereby supporting tourism. The proposal is therefore particularly timely in light of the confirmed expansion of Heathrow Airport through the delivery of a third runway. Accordingly, the provision of additional visitor accommodation in this location is of both local and national significance.
- 6.2.25 The GLA's 2017 Visitor Accommodation Working Paper identifies a projected demand for 58,000 hotel rooms between 2015 and 2041, equating to an average of 2,230 rooms per year. Within this context, Hillingdon ranks third in projected net demand, requiring 4,947 additional rooms (8.5% of total demand). At the local level, Policy E2 of the Hillingdon Local Plan Part 1 commits to delivering at least 3,000 additional hotel bedrooms between 2007 and 2026. However, this figure is derived from evidence predating 2012 and is therefore likely to underestimate the current requirements. Crucially, demand is expected to increase further following the Government's commitment to the delivery of a third runway at Heathrow, reinforcing the strategic importance of expanding hotel capacity in the borough.
- 6.2.26 Given the age of the earlier assessments, and in light of the planned expansion of the third runway, the planning application is supported by a Hotel Needs Assessment prepared by Colliers. This study identifies that the GLA's projected requirement of 2,230 rooms per year represents a *net* figure, with no allowance for rooms lost through attrition. Colliers advise that the gross requirement should therefore be uplifted to 2,962 rooms per annum, reflecting the true scale of need.
- 6.2.27 Based on this revised position, Colliers calculate that serviced accommodation supply within Hillingdon would need to increase to 16,439 rooms by 2024, compared with 9,885 rooms in 2015, to meet anticipated demand. The assessment also reports average hotel occupancy of 86% in the area, which they consider indicative of unsatisfied demand and displacement of visitors outside the borough.
- 6.2.28 Furthermore, the study highlights a notable undersupply of economical hotel accommodation within Hillingdon, with the existing stock predominantly comprising higher-end hotels. This imbalance demonstrates a clear and evidenced need for the affordable hotel offer proposed by Toyoko Inn.
- 6.2.29 In light of this, the hotel will be well received by key users of overnight accommodation in the area. The proposed development will play a vital role in retaining demand within the locality and Hillingdon, especially during peak periods when demand might otherwise be displaced to the unregulated shared economy sector or other establishments outside the Borough. Therefore, the proposed use is required and entirely appropriate.

Location of the Hotel



6.2.30 The site represents an optimal location for a hotel serving Heathrow, as evidenced by the concentration of similar uses in the surrounding area. The accompanying Needs Assessment further demonstrates a clear requirement for additional hotel provision within the area. In addition, the Council's pre-application advice letter (LPA ref. 36728/PRC/2025/89) confirms that the proposed use is compatible with the character of the locality. Together, this establishes that the site is well-suited for hotel development.

6.2.31 Policy E2 of the Hillingdon Local Plan encourages the delivery of new hotels and visitor facilities in Uxbridge, Hayes, sites outside designated employment land on the Heathrow perimeter, and other sustainable locations. In addition, Policy DME 5 of the Hillingdon Local Plan Part 2 (Hotels and Visitor Accommodation) supports a diverse range of visitor accommodation, conference venues, and related facilities in accessible and sustainable locations.

6.2.32 Hotel developments are generally directed towards town centres or Opportunity Areas, subject to the application of a sequential test. London Plan Policy E10 stipulates that, outside the Central Activities Zone (CAZ), serviced accommodation should be prioritised within these designated areas, in accordance with the sequential test set out in Policy SD7 of the London Plan. While the proposals are consistent with overarching policy objectives with regard to it being in an Opportunity Area, the site lies outside the main Heathrow Boundary Area and beyond a designated town centre. Consequently, new main town centre uses, including hotels, must comply with the 'town centres first' approach. Policy SD7 reinforces this principle, requiring boroughs to discourage most non-residential development in out-of-centre locations.

6.2.33 Paragraph 91 of the NPPF requires that proposals in this context be accompanied by a sequential test. This must demonstrate that no suitable town centre or edge-of-centre sites are available, or are likely to become available within a reasonable timeframe. Applicants must also ensure that the proposed development does not undermine the vitality or viability of existing town centres. The Colliers Need Assessment indicates that there is unsatisfied demand and displacement of visitors outside the borough which clearly indicates a need for the hotel at the location, particularly one that is more economical than others in the vicinity.

6.2.34 Although the site is sustainably located close to Heathrow and within an Opportunity Area, the Council has requested that the application be supported by a Sequential Test. This is to establish whether any alternative sites within existing designated town centres are available to accommodate the proposed hotel. Notwithstanding the fact that the proposed hotel is specifically intended to serve Heathrow, the application is therefore submitted with a Sequential Test as part of the planning submission. It should be noted that the Sequential Test was submitted with the pre-application submission to the Council and has since been updated following feedback from officers. This is submitted with the planning application and should be read alongside this Planning Statement.

6.2.35 A summary of the feedback on the Sequential Test and our response is provided below:

LPA Comment	Applicant Response
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Exact origin points needs to be confirmed to support the 20minute public transport radius to the adjacent town centres.	A 20-minute radius has been applied, consistent with the approach previously accepted by the Council in other Sequential Tests within the Borough, including applications at 242 Bath Road and 118 Bath Road. Using the TfL Public Transport Journey Planner, with Heathrow Terminal 2 & 3 as the point of origin, the assessment confirms that the identified centres of West Drayton, Hayes, Hounslow West, and Southall all fall within a 20-minute public transport catchment. We maintain that these locations therefore represent an appropriate and proportionate area of search for the purposes of the Sequential Test.
A site threshold of 150 rooms should be considered.	Applicant does not consider it reasonable to identify sites with a minimum threshold of 150 rooms, as the proposed development comprises 206 bedrooms, a figure determined directly by the operator's established business model. Any reduction in capacity would raise significant concerns regarding the commercial viability and operational performance of the hotel. Furthermore, the supporting Hotel Needs Assessment prepared by Colliers demonstrates substantial demand for additional hotel accommodation across Hillingdon and London, with clear evidence of unsatisfied demand and displacement of visitors outside the Borough. The Assessment also notes a lack of mid-level hotels in the area. In this context, it is not considered pragmatic to reduce the threshold size or to assess sites outside the Heathrow area or Borough, particularly where displacement is already occurring and where average occupancy levels of 86% indicate a constrained market.



Officers requested that areas of Feltham, Staines and Slough and Hounslow Central need to be considered.	We note that other Sequential Tests do not consider sites within the town centres of Feltham, Staines, Slough, and Ealing. These locations are unsuitable as they do not meet the criteria for a hotel intended to serve the Heathrow Airport market. This point was found acceptable by the Council in the issue of its decision to grant planning permission at these other sites. It would not be reasonable to expect users of Heathrow to travel to these centres.
The Sequential Test needs to consider sites from a range of sources.	A separate table of sites has been prepared and submitted alongside the planning application. This sets out the range of sources and commercial agents consulted in identifying potential sites. The table also confirms whether each site has been found to be available on the open market.
Sites should include those which are allocated in the local plan or in draft allocations. Sites search should also include recent planning permissions.	The updated table shows which sites form allocations or draft allocations in emerging plans. We have also identified five recent sites that have received resolution to grant at planning committee.

6.2.36 It is maintained that a thorough and reasonable search has been undertaken for sites within a 20-minute radius of Heathrow. 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), West Hounslow (LB Hounslow), or Southall (LB Ealing) for the proposed hotel. This represents a pragmatic search area, and extending out the radius further would not make commercial sense for the operator.

6.2.37 Taking a comprehensive view, it is clear that the application site is not suitable for continued office use, that there is a demonstrable need for additional hotel accommodation, and that the site represents an appropriate and sustainable location for such a use. On this basis, we consider the principle of the development to be fully acceptable.



6.3 Design & Townscape

- 6.3.1 The accompanying Design and Access Statement, prepared by SHR Studio, sets out the design principles of the proposals, including design evolution, and how this has resulted in an attractive and high-quality building.
- 6.3.2 Policy at all levels requires high quality design. Paragraph 131 of the NPPF sets out that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 6.3.3 London Plan Policy D3 (Optimising site capacity through the design-led approach) promotes the optimisation of site capacities and making the best use of land through a design-led approach. As part of the design-led approach, development proposals should facilitate efficient servicing and maintenance of buildings, have due regard to existing and emerging building hierarchy and achieve safe, secure and inclusive environments. Measures to design out exposure to poor air quality and noise from both external and internal sources should be integral to development proposals and be considered early in the design process. Optimising site layout and building design can also reduce the risk of overheating as well as minimising carbon emissions by reducing energy demand.
- 6.3.4 Local Plan Policy DMHB11 (Design of New Development) states that all development should harmonise with the local context by taking into account the surrounding scale of development, considering the height, mass and bulk of adjacent structures. Development should also incorporate principles of good design using high quality building materials and finished and ensuring that the design maximises sustainability.
- 6.3.5 Policy DME5 of the Local Plan refers to Hotel and Visitor Accommodation which confirms proposals should comprise a high standard of building and site design, including landscaping and placement of signage that makes a positive contribution to local amenity and streetscape. The policy confirms that there should be no impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants.
- 6.3.6 Policy DMHB 12 relates to public realm and states that proposals should improve legibility and promote routes and wayfinding between the development local amenities. The public realm should account of the established townscape character and quality of the surrounding area.
- 6.3.7 The design of the hotel seeks to achieve several key objectives, including; enhancing the appearance of the existing building, retaining as much of the existing fabric as possible, improving the public realm and introducing new greening, creating a welcoming and legible entrance, and delivering a high-quality architectural expression. This approach reflects the identity of the hotel operator and helps distinguish the building from others in the surrounding area which in turn aids legibility in accordance with good quality design principles specified under Local Plan Policy DMHB11 and DMHB 12.



6.3.8 The proposal includes a modest infill extension at the north-eastern corner to complete a uniform four-storey building and provide additional hotel accommodation, measuring approximately 538 sqm. A new double-height glazed entrance volume, also measuring 102 sqm, is proposed above the existing entrance to improve legibility and create a bold, clearly defined principal arrival point. The scale and form of the development accord with Policy DMHB11, which requires proposals to respond appropriately to local context. Surrounding buildings range between three and six storeys, and the proposal simply unifies the existing structure into a consistent four-storey form. The proposed extensions are located approximately 50 metres from the nearest residential properties to the north, as such the proposals are not expected to give rise to any adverse impact on neighbouring occupiers.

6.3.9 The proposed design delivers a high-quality architectural appearance in accordance with Policy DMHB11. The elevations will be unified through lightweight shoji-inspired screening applied consistently across all façades, introducing visual interest and creating a renewed, clean and contemporary form. Decorative vertical fins will also be incorporated into the double-height glazed entrance structure. Both the fins and screens will be constructed from cement-board material with a refined vertical rhythm. These and the updated window frames will be designed in a hessian-coloured infill to the panels, to provide a warm and aesthetically pleasing tone to the appearance.

6.3.10 As mentioned, the facade treatment provides a subtle reference to traditional shoji screens, aligning the design with the cultural heritage of the hotel operator. The surrounding townscape is varied and includes both modern and established hotel and commercial buildings, reflecting a diverse architectural context. The proposed design narrative is therefore considered to enhance local townscape quality, reinforce the building's identity to help it stand out from other hotels in the area, and improve its legibility within the wider context.

6.3.11 Overall, the proposed development is of a high-quality design in line with national, strategic and local policy and guidance.

6.4 Amenity and Quality

6.4.1 Policy DME5 of the Local Plan refers to Hotel and Visitor Accommodation and makes refers to amenity, noting that proposals should have no adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking or any other potential nuisance, parking or traffic congestion.

6.4.2 Policy DMHB 11 of Hillingdon Council's Local Plan Part 2 seeks to ensure that development proposals do not adversely impact residential amenities, daylight, and sunlight of adjacent properties, and open space. The supporting text for this policy states that the Council will expect new development proposals to carefully consider layout and massing to ensure development does not result in an increased sense of enclosure and loss of outlook.



- 6.4.3 The nearest neighbouring properties are located on Heath Close, approximately 50 metres to the north. Owing to the nature of the proposed works, together with the substantial separation distance, the development will not result in any harmful loss of outlook, daylight, sunlight or privacy for neighbouring occupiers. Existing landscaping around the site will be retained and enhanced to provide additional noise buffering. This position aligns with the conclusions set out in the Council's pre-application advice letter.
- 6.4.4 Furthermore, the proposals will include less car parking than currently on site, as such, this will result in less vehicular noise and pollution. Notwithstanding this, a Noise Impact Assessment has been submitted with the planning application, which confirms that the noise arising from the development is within the acceptable limits.
- 6.4.5 The internal quality of the scheme has been designed to a very high standard, incorporating best-practice inclusive design principles. These include level access to the main and staff entrances, Part M-compliant lifts serving all floors, and ambulant disabled stairs ensuring equal access to all. In addition, 10% of hotel rooms will be designed as accessible rooms in accordance with Part M requirements.
- 6.4.6 It should be noted that 10% of the rooms will be windowless rooms, arising from the existing building's structural configuration. There is no planning policy that prohibits windowless hotel rooms. These rooms will be equipped with high-quality mechanical ventilation and heating systems to ensure appropriate air quality and thermal comfort. They offer a more affordable option for guests who typically spend limited time in their rooms such as travellers arriving late for early-morning flights. Given their intended short-stay function and the mitigation measures proposed, these rooms are considered acceptable.

6.5 Landscaping & Public Realm

- 6.5.1 Policy DMHB 14 of the Local Plan refers to trees and landscaping which confirms all developments will be expected to retain or enhance existing trees and landscaping. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to off-site provision.
- 6.5.2 Policy DMHB 12 relates to public realm and states that proposals should improve legibility and promote routes and wayfinding between the development local amenities. The public realm should account of the established townscape character and quality of the surrounding area.
- 6.5.3 In this case, the proposals are fully compliant with relevant policies. The scheme delivers meaningful enhancements to the public realm and landscaping across the site. It retains as many existing trees as possible, with the removal limited to 8 Category C trees and 2 Category U trees. The Category C trees are proposed for removal to facilitate landscape improvements and servicing arrangements, while the Category U trees require removal due to their poor health. As confirmed in the supporting Arboricultural Impact Report, none of these trees are of high amenity value. In accordance with Policy DMHB 14, the scheme includes substantial new planting, including 16 higher-quality replacement trees that will provide improved amenity value and a stronger canopy cover. These new trees will enhance the site's visual appearance and contribute positively to its long-term character.



- 6.5.4 In line with Policy DMHB 12, the landscape strategy seeks to significantly enhance the quality and legibility of the public realm, replacing the existing hard-surfaced car park environment with a more coherent and attractive setting. The site currently lacks clear wayfinding and defined entrances and is dominated by 199 car parking spaces. The proposals therefore include a reduction in parking provision to 152 spaces, creating opportunities for new landscaping and amenity areas adjacent to the hotel and along site boundaries.
- 6.5.5 The proposals also aim to improve the arrival experience by enhancing sightlines from the eastern footpath entrance. The footpath will be realigned, opened up, and upgraded with new lighting, signage, and entrance features, including additional tree planting. The landscaping strategy will soften and green the site, providing opportunities for hotel guests to dwell and enjoy the outdoor environment through the introduction of seating nooks integrated within new planting. The strategy further incorporates enhanced buffer zones around the buildings and the planting of key feature trees at prominent corners. This is done to soften up the appearance of the building and site and also to provide key separation space for ground floor rooms.
- 6.5.6 Overall, the tree and landscape strategy is fully compliant with the relevant development plan policies.

6.6 Ecology and Biodiversity Net Gain

- 6.6.1 NPPF Paragraph 8 seeks to secure net gains within the three underpinning objectives of sustainable development, including improvements to biodiversity and the quality of the natural environment. Paragraph 187 also explicitly states that opportunities to incorporate biodiversity improvements within development proposals should be strongly encouraged, especially where this can secure measurable net gains for biodiversity.
- 6.6.2 Local Plan Policy DME1 7 requires development to retain and enhance features of biodiversity value.
- 6.6.3 A Preliminary Ecology Appraisal and Biodiversity Net Gain Assessment has been prepared by Love Design Studio. This assesses the likely impacts of the proposed development on biodiversity. The appraisal confirms that no statutory or non-statutory nature conservation designations are present within the site and appropriate mitigation measures have been provided to safeguard any potential risks for good practice. This includes works to trees being carried out outside of nesting season and use of appropriate external lighting. The Assessment confirms low ecological value and thus no significant harm to ecology.
- 6.6.4 The Biodiversity Net Gain Assessment shows that through the range of tree planting and landscaping, the proposed development will achieve on site biodiversity net gain of 17.37%, exceeding the benchmark 10% biodiversity enhancement required for Biodiversity Net Gain.

6.7 Energy and Sustainability

- 6.7.1 The applicant has undertaken an assessment of the predicted energy performance and carbon dioxide emissions for the proposed development using the London Plan's energy hierarchy (Policy SI2): Be lean - use less energy and manage demand during operation; Be clean - exploit local energy resources and



supply energy efficiently and cleanly; Be green - maximise opportunities for renewable energy by producing, storing and using renewable energy on-site; and Be seen - monitor, verify and report on energy performance.

6.7.2 Chapter 9 of the London Plan requires the highest standards of sustainable design and construction to be used to improve the environmental performance of new developments and to ensure they can adapt to the effects of climate change over their lifetime. Major development proposals should meet the minimum standards sets out in the London Mayor's Sustainable Design and Construction SPG (2014).

6.7.3 Local Plan Part 2 Policy DMEI 2: Reducing Carbon Emissions requires that all developments make the fullest contribution to minimising carbon dioxide emission in accordance with London Plan targets. Local Plan Part 1 Policy EM1 (Climate Change Adaptation and Mitigation) reiterates the requirements of new development to meet the carbon reduction target savings set out in the London Plan.

6.7.4 The key design features to achieve carbon reductions include:

- Enhanced building fabric performance;
- Highly efficient ASHP Heating and Cooling and ASHP hot water generation systems;
- Installation of mechanical ventilation heat recovery systems;

6.7.5 The proposed development seeks to deliver carbon savings in line with the energy hierarchy. By adopting this approach, the development will achieve 60.68 tones CO₂ / year representing a 83.26% improvement over Part L1 2021 of the Building Regulations in respect of regulated carbon dioxide emissions.

6.7.6 Overall, the proposals have sought to incorporate to the relevant London Plan and Local Plan policies considerations regarding energy and sustainability. The remaining carbon emissions will be offset via a financial contribution to be secured via Section 106 agreement.

6.8 Overheating

6.8.1 Policy SI 4 of the London Plan seeks to understand how developments manage and reduce overheating of developments.

6.8.2 The planning application is supported by an Overheating Assessment prepared by Charles Andrews. The Assessment reviews the quality of the internal environment within the hotel rooms. It acknowledges that TM52 and TM59, which are commonly used for overheating analysis in standard residential and commercial development, are not appropriate for hotel schemes, as these methodologies are based on naturally ventilated, free-running buildings rather than mechanically conditioned spaces such as hotel bedrooms. When assessed against TM52 and TM59, the rooms do not meet the required criteria level; however, the Assessment submitted correctly applies EN 16798-1 Category II, the relevant performance standard for ventilation and indoor air quality in mechanically conditioned buildings.

6.8.3 The proposed hotel will be equipped with heat recovery VRF air-conditioning system (air source heat pump based) specifically designed to regulate internal temperatures. Once operational, these systems will



maintain comfort conditions in accordance with EN 16798-1 Category II. Mechanical cooling therefore provides a robust and effective mitigation measure for any potential overheating identified under TM52 and TM59. As a result, the scheme will ensure that rooms remain adequately ventilated and thermally comfortable in line with recognised building quality standards. Therefore, the proposed scheme meets relevant policy in the development plan.

6.8.4 In the event of a ventilation or air-conditioning system failure, the Overheating Assessment confirms that each bedroom will be served by an individual, dedicated ventilation system. Any failure would therefore be isolated to a single room, which would need to be repaired promptly before being reoccupied. The air-conditioning system will operate in zones, with each zone serving approximately 10–12 rooms. A failure would therefore affect only one zone at a time, and again, repairs would be required as soon as practicable to restore full functionality before the room is occupied.

Overall, the proposed development will achieve thermal comfort and ventilation performance in accordance with EN 16798-1 Category II, the industry standard for assessing hotel compliance with overheating criteria.

6.9 Noise

6.9.1 The NPPF requires new development to be appropriate to its location when considering the effects of pollution sources including noise and vibration (Paragraph 185). Consequently, planning applications should demonstrate that development will not unacceptably introduce or be detrimentally sensitive to existing pollution sources, with all applications expected to demonstrate that new noise sources can be successfully mitigated and/or reduced to minimise potential impacts.

6.9.2 Local Plan Part 1 Policy EM6 (Land, Water, Air and Noise) states that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated. The application is accompanied by a Noise Impact Assessment, prepared by Noise Solutions. A noise survey was conducted to establish the background and ambient sound levels, utilised to derive appropriate limits for any sound caused from the proposed development. The noise assessment confirms that the external building fabric assessment found that the calculated internal noise meets the guidance in recognised standards and guidance. The assessment has demonstrated that taking into consideration the provision of reasonably practicable measures in the form of high-performance double glazing, the adverse effects of noise can be minimised.

6.10 Air Quality

6.10.1 London Plan Policy SI 1 states that development proposals should not lead to further deterioration of existing poor air quality. Development proposals should, as a minimum, be Air Quality Neutral, and use design solutions to prevent or minimise increased exposure to existing air pollution.

6.10.2 The proposed development is designated within the LB Hillingdon Air Quality Management Area under Local Plan Policy DMEI 14 (Air Quality). Policy DMEI 14 states that development proposals should, as a



minimum, be at least air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, and actively contribute towards the improvement of air quality.

- 6.10.3 Local Plan Policy EM8 states that all major development proposals within the Air Quality Management Area (AQMA) should actively contribute to the promotion of sustainable transport measures; deliver increased planting through soft landscaping; and provide a management plan for ensuring air quality impacts can be kept to a minimum.
- 6.10.4 An Air Quality Assessment has been prepared by Charles Andrews which accompanies the planning application, assessing any impacts arising from dust emissions during construction, road vehicle exhaust emissions during construction and operation and from plant. It is evident from the Assessment that with the mitigation measures, including dust suppression, low emission plant and vehicles, and the use of sustainable transport initiatives, the overall impacts of the proposed development are not expected to be significant. Collectively, these actions aim to achieve air quality neutral.

6.11 Flood Risk and Drainage

- 6.11.1 London Plan Policy SI 12 (Flood Risk Management) states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI 12 (Sustainable Drainage) states that proposals should aim to achieve greenfield run-off rates, with a preference for green over grey features in accordance with the drainage hierarchy.
- 6.11.2 LB Hillingdon Local Plan Part 1 Policy EM6 (Flood Risk Management) seeks to direct development away from Flood Zones 2 and 3, in accordance with the principles of the NPPF. Policy EM6 states that the Council will require all development across the borough to use sustainable urban drainage systems (SuDS), unless demonstrated that it is not viable.
- 6.11.3 LB Hillingdon Local Plan Part 1 Policy EM6 (Flood Risk Management) seeks to direct development away from Flood Zones 2 and 3, in accordance with the principles of the NPPF. Policy EM6 states that the Council will require all development across the borough to use sustainable urban drainage systems (SuDS), unless demonstrated that it is not viable.
- 6.11.4 Local Plan Part 2 Policy DMEI 10 (Water Management, Efficiency and Quality) states that all new build development applications are required to include a drainage assessment demonstrating that appropriate SuDS have been incorporated in accordance with the London Plan. In accordance with Policy DMEI 10, a Flood Risk Assessment and Drainage Strategy has been prepared by Flo Consultant Engineers.
- 6.11.5 The site lies within Flood Zone 1, and the Envirocheck historic flood mapping confirms that no flooding from any source has previously occurred at this location. The Assessment identifies existing drainage infrastructure that currently manages surface water run-off from the building and surrounding hard-standing areas, discharging to the adjacent highway sewer network. As the building is to remain in its existing form and the proposed external works will not alter the current drainage arrangements, there



will be no change to surface water discharge rates, volumes, or outfall locations. Accordingly, the proposed change of use will not increase surface water run-off or elevate flood risk to the site, the existing drainage systems, neighbouring land, or nearby properties.

- 6.11.6 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, above any areas of risk.
- 6.11.7 Overall, the supporting assessment has demonstrated that the proposed development is safe for its lifetime in terms of its users and will not increase flood risk to neighbouring land or property. The proposed development, in terms of flood risk is deemed acceptance.

6.12 Aerodrome Safeguarding

- 6.12.1 Policy DMAV 1 (Safe Operation of Airports) states that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.
- 6.12.2 As the current proposal involves only a change of use of the existing building, with no upward extensions or alterations to its height, Officers at the London Borough of Hillingdon have confirmed that an Aerodrome Safeguarding Report is not required. The proposed change of use will have no impact on aircraft operations or aviation safety.

6.13 Contamination

- 6.13.1 A Preliminary Land Contamination Risk Assessment has been prepared by Merebrook Consulting to identify potential land contamination risks and geo-environmental constraints that could impact upon the proposed development. The report confirms that the site was first developed in the 1980s but was previously unoccupied fields before that date.
- 6.13.2 The report confirms that no significant soil contamination is anticipated on the site and that the existing building contains no asbestos. It also identifies a very low risk of hazardous ground gas migration from the adjacent historic landfill. As a precaution, the report recommends that any suspected ground contamination encountered during works be reported to Merebrook for assessment and appropriate action. Any materials or waste soils not retained on site should be removed and disposed of in accordance with all relevant statutory requirements.

6.14 Transport

- 6.14.1 The NPPF requires all new development to contribute to the achievement of sustainable development, which comprises three overarching objectives: economic, social and environmental (Paragraph 8), which are mutually supportive and combine to meet the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7). When determining planning applications,



development should only be refused on highways grounds where they would have an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (Paragraph 115). In demonstrating an acceptable impact, planning applications should be supported by a Transport Assessment that can outline any impacts of the proposal (Paragraph 117).

- 6.14.2 Policy DMT1 of the Local Plan makes reference to transport impacts and requires proposals to be accessible, maximise safe, convenient and inclusive accessibility whilst adequately addressing delivery, servicing and drop-off requirements ensuring no adverse transport or associated air quality and noise impacts.
- 6.14.3 Policy DMT2 requires proposals to ensure safe and efficient vehicular access to the highway network is provided, ensuring impacts on local amenity and congestion are minimised, using suitable mitigation measures to address any impacts.
- 6.14.4 The accompanying Transport Statement prepared by i-Transport, demonstrates that the proposed development has access to sustainable travel options, as well as links to public transport services. In particular, the site is easily located to the Hotel Hoppa bus service.
- 6.14.5 The existing site as part of its office use has 199 number parking spaces. This is proposed to be reduced to 152 spaces in line with the aspirations to reduce the dependency on cars. This is deemed to be in compliance with relevant planning policy.
- 6.14.6 Both uses typically are associated with a higher trip generation due to the transient nature of uses, however, given the reduction in car parking and the use of shuttle services, it is noted from the Transport Statement that the level of trips associated with the proposed development is comparable with the existing use. The tables included in the Transport Statement show the net trip difference and importantly across the daytime the proposed level of trips is comparable with the existing office, however, there is minor daily net increase. This is to be expected with the 24hr nature of a hotel use servicing Heathrow.

6.15 Archaeology

Policy HE1: Heritage: states that the Council will conserve and enhance Hillingdon's heritage assets include Archaeological Priority Zones. The planning application is accompanied by a Archaeological Desk-Based Assessment as the site is located in an Archaeological Priority Zone. It concludes that there is some potential for significant archaeological remains in the area. However, given the minor nature of the proposals, it recommends a watching brief is undertaken during the construction, specifically during ground-intrusive elements associated with re-surfacing and hard landscaping elements of the proposal.

6.16 Fire

- 6.16.1 The accompanying Fire Statement, prepared by MU Studio, details the fire safety strategy for the development and demonstrates compliance with the relevant Building Regulations and London Plan



Policy D5 (Inclusive Design) and Policy D12 (Fire Safety). MU Studio, a specialist fire safety consultant, has been involved in the design process since the early stages of design development.

- 6.16.2 The Fire Statement sets out the principles and approaches relating to fire safety that have been applied throughout the design process, including emergency access and water supplies for firefighting purposes, and the provision of fire points and internal fire fighting apparatus.
- 6.16.3 Due to the measures set out in the Fire Statement combined, MU Studio is of the view that the emerging scheme compliance with the relevant London Plan policies and Building Regulations.



SECTION 7

Section 7 Conclusion



7.0 Conclusion

7.1.1 This Planning Statement has been prepared in support of a detailed planning application submitted to the London Borough of Hillingdon for the provision of a new hotel on Bath Road. The proposed development seeks to change the use of the existing building, which has been confirmed as no longer suitable for continued office use, to a hotel serving Heathrow Airport and the wider area. The proposed hotel will operate within the mid-market sector, addressing an identified shortfall of accommodation within this segment of the local market.

7.1.2 The proposals comprise internal reconfiguration and external alterations to the existing building to deliver a total of 206 guest rooms. Enhancements to the site and surrounding public realm are also proposed, including improved greening, biodiversity, and legibility. Overall, the scheme will bring an underutilised building back into active use and deliver meaningful employment opportunities within the Heathrow Opportunity Area.

7.1.3 The proposals will provide a wide range of planning and regeneration benefits for the site and surrounding area. These benefits include:

- The proposals will replace the underutilised office building with a high-quality, viable hotel that serves the Heathrow market. The scheme will ensure the property is brought into viable use, introducing activity and vitality to the site and the wider area.
- The proposals will substantially improve the appearance of the existing building and site, delivering a hotel with a high-quality design and appearance that contributes positively to its immediate surroundings and enhances the wider townscape.
- The development will revitalise the site and contribute positively to the local economy by generating significant employment opportunities through hotel operations. It is anticipated that Toyoko Inn will employ approximately 59 staff, providing both direct jobs and wider economic benefits to the community.
- The proposals will deliver meaningful public realm enhancements and landscape improvements, enhancing urban greening and achieving biodiversity net gains. The scheme will open the site, improve the legibility of the building, and create a more accessible and attractive environment for users of the hotel.
- Sustainable design and construction measures will be utilised including adopting a fabric first approach with enhanced fabric performance, highly efficient ASHP systems, mechanical ventilation systems with low specific fan power and heat recovery.

7.1.4 Planning Statement has assessed the material considerations arising from the proposals against the prevailing planning policy framework and has demonstrated that the scheme complies with the relevant



national and local planning policy and guidance. It is therefore respectfully requested that the proposals are recommended for approval at the earliest opportunity.



CARNEY SWEENEY