

**MJP
PLANNING**

SAL HOTELS LTD

**MERCURE HOTEL CAR
PARK, SHEPISTON LANE,
HAYES**

Redevelopment above the
lower level car park for
additional apart hotel
accommodation

PLANNING STATEMENT



1.0 Introduction

1.1 This planning statement has been prepared by MJP Planning on behalf of Sal Hotels Ltd ("the applicant"). The applicant is proposing redevelopment above the lower level car park for additional apart hotel accommodation at Mercure Hotel Car Park, Shepiston Lane, Hayes (UB3) ("the site").

1.2 Full planning permission is sought for ("the proposal"):

"Demolition of existing car park (with retention of the lower car park level), partial extension of lower ground floor, and erection of 5 storey building providing apart-hotel suites (Class C1), landscaping alterations and associated development."

1.3 The development represents a sustainable intensification of brownfield land associated with an established C1 Use, in a location of strategic importance close to Heathrow Airport and Hayes & Harlington Station. The principle of hotel accommodation on the site is firmly established and strongly supported by policy, including London Plan Policy E10 and Local Plan Policy DME 5, which promote high-quality visitor accommodation in sustainable locations. This position was clearly reinforced through the Council's pre-application response, confirming that a hotel building in this location is acceptable in principle. The current application has been positively shaped in direct response to that feedback, evolving into a more refined, proportionate and design-led scheme. The proposal will deliver the sustainable redevelopment of underutilised brownfield land within an established hotel campus, supporting Heathrow related demand while significantly enhancing the appearance, functionality and long-term resilience of the wider Mercure Hotel complex.

1.4 The application is supported by a suite of supporting documents, which should be read in conjunction with this planning statement. The full submission comprises the following:

- Air Quality Assessment, by The PES Ltd
- Airport Safeguarding Assessment, by ASA
- Arboricultural Impact Assessment, by Hayden's Arboricultural Consultants Ltd
- Biodiversity Net Gain Assessment, by Beamsley Ecology
- Daylight, Sunlight and Overshadowing Assessment, by C3 RE Ltd
- Design and Access Statement, by Goldstein Heather Architects
- Design and Construction Method Statement, by YES Engineering Group Ltd
- Energy and Sustainability Statement, by The PES Ltd
- Fire Statement, by Mu.Studio (UK) Ltd
- Flood Risk Assessment and Surface Water Drainage Strategy, by Aegaea Ltd
- Noise and Vibration Impact Assessment, by ALN Acoustic
- Planning Statement by MJP Planning
- Plans Pack, by Goldstein Heather Architects
- Preliminary Ecological Appraisal, by Beamsley Ecology
- Sequential Assessment, by Profectus Planning
- Servicing and Waste Management Plan, by YES Engineering Group Ltd
- Transport Assessment, by YES Engineering Group Ltd

1.5 This statement is structured as follows:

- **Section 2** - describes the site and its surroundings, the planning history and pre-application engagement;



- **Section 3** - details of proposed development;
- **Section 4** - highlights the national, regional and local planning policy and guidance relevant to the determination of the application;
- **Section 5** - assesses the proposed development against the relevant policies of the Development Plan and considers the planning balance case; and
- **Section 6** - provides a conclusion outlining the benefits of the proposal in the context of planning policy.



2.0 Site Context and Planning History

- 2.1 The site comprises a two storey decked car park to the rear of the existing Mercure Hotel, located on the eastern side of Shepiston Lane. The hotel currently provides 184 bedrooms and is situated in a predominantly commercial and residential area just south of Hayes town centre, in close proximity to Hayes & Harlington Station and Heathrow Airport.
- 2.2 The site is designated brownfield land and currently provides surface and structured parking for hotel guests, staff, and coaches. Vehicular access is via Shepiston Lane, with separate entry points to the upper and lower levels. The site adjoins Elm View House to the north (a residential block with south-facing windows), Hayes Fire Station to the south, and is separated from a conservation area by the M4 motorway.
- 2.3 The site extends to approximately 1,375 sqm and has a PTAL of 2. It is subject to a Tree Preservation Order, with existing trees primarily located around the site boundaries. The adopted Policies Map does not identify the site as being subject to any specific site allocations or designations. The site lies within an Air Quality Management Area and Air Quality Focus Area. Other relevant site surroundings include Hayes Town Centre, which is 1.5km north, reflective of a five to seven minute-drive. Meanwhile, West Drayton Town Centre is 3.4km to the north-west of the site (a 9-minute drive). These two centres represent the only town centres within a 10-minute drive-time of the application site and are also considered to be broadly within a 10-minute drive-time of Heathrow Airport.

Planning History

- 2.4 The site has an extensive planning history, including a notable consent for the partial redevelopment of the car park:
- Ref. 382/APP/2014/1117: Permission granted (December 2014) for the retention and conversion of the existing car park to provide 25 additional hotel bedrooms, together with façade enhancements and a new link bridge to the main hotel building. This permission has since lapsed, but it establishes precedent for both vertical extension and the intensification of hotel use. Having reviewed the Officer Report in connection with this scheme, it is noted that there was no requirement for the applicant to apply the sequential test to the extension floorspace, and the officer did not make any mention of town centre policy tests in reaching their positive decision.
- 2.5 A review of the site's planning history confirms that a series of permissions were granted between 2007 and 2013 for a three storey extension to the hotel, providing an additional 51 bedrooms. These proposals also included the demolition of an existing 25 bedroom wing to facilitate the redevelopment. The relevant application references are: 382/APP/2006/2935, 382/APP/2007/3653, 382/APP/2010/1404 and 382/APP/2013/1163.
- 2.6 In addition, an appeal decision for a nearby site at 29–31 Shepiston Lane, is of relevance:
- Ref: APP/R5510/W/20/3265428: In 2020, permission was granted on appeal for the redevelopment of a former hotel (C1 use) to provide a contemporary three-storey, 97-bedroom hotel. While the original application was refused on design, amenity, and highways grounds, the Inspector allowed the appeal, recognising the appropriateness of hotel use in this area, subject to good design and minimal amenity impacts.



Pre-application Engagement

- 2.7 The applicant engaged proactively with the London Borough of Hillingdon through the Council's formal pre-application process prior to submission of this planning application. A request for pre-application advice was submitted on 2 September 2025, followed by a meeting with officers on 17 November 2025. Written officer advice was subsequently issued under reference 382/PRC/2025/147 dated 23 March 2026.
- 2.8 The Council's written response was constructive and identified the principal planning matters requiring detailed consideration through any future planning application. These included the acceptability of additional hotel accommodation in this out-of-centre location, including application of the sequential test having regard to the proposal's main town centre use classification. Importantly, the Council advised that taking into consideration that a hotel extension was approved on the site before but not built (382/APP/2014/1117) a hotel building is not objected to in this location.
- 2.9 Officers also highlighted the need to carefully assess the scale, height, massing and visual impact of the proposed building, together with its relationship to the surrounding townscape and neighbouring development. Particular attention was drawn to the relationship with nearby residential occupiers, most notably Elm View House to the north, including outlook, privacy and daylight considerations.
- 2.10 The Council further identified transport and highways matters requiring assessment, including parking provision, access arrangements, servicing, deliveries and the continued operation of the wider hotel site. Comments were also raised in respect of trees, landscaping, biodiversity and the quality of the external environment. In addition, officers noted the need for appropriate technical assessment in relation to air quality, noise, drainage, land contamination and fire safety matters.
- 2.11 The current application has been carefully progressed in direct response to that officer feedback. For further details, please see the submitted Design and Access Statement at page 11. Most notably, the scheme has evolved materially since pre-application stage, with the earlier six storey, 43 suite concept refined to a five storey proposal providing 38 apart-hotel suites. This reduction in overall scale demonstrates a positive and responsive design process aimed at improving visual integration, reducing perceived massing and further safeguarding neighbouring amenity.
- 2.12 The application is accompanied by a comprehensive suite of supporting documents, including a Design and Access Statement, Sequential Assessment, Transport Assessment and other technical reports, which collectively respond to the matters identified by officers through the pre-application process. The submitted Design and Access Statement provides a detailed explanation of how the proposals have evolved and demonstrates that the scheme has been positively shaped through meaningful engagement with the Council.



3.0 Proposed Development

- 3.1 The section is intended to be a high-level summary of the proposal and should be read in conjunction with the detailed assessment set out within the submitted DAS.
- 3.2 The proposal will transform an outdated multi-storey car park into a high quality apart-hotel development, for a short to medium term stay, that functions as an extension to the existing Mercure Hotel complex, strengthening and modernising the wider hotel campus. Delivering 38 self contained serviced suites, enhanced landscaping and a carefully designed building form, the scheme will optimise this brownfield site, create a positive new frontage to Shepiston Lane and remain sensitive to neighbouring amenity and the surrounding context.
- 3.3 The proposed description of development is:

“Demolition of existing car park and erection of 5 storey hotel building (with retention of the lower car park level) providing apart-hotel suites (Class C1), landscaping alterations and associated development”

- 3.4 A schedule of accommodation for the proposed apart-hotel extension is set out below:

	GIA (sqm)	NSA Hotel Rooms (sqm)	Number of one bedroom suites	Number of two bedroom suites	Total Number of Suites
Ground	848	367	0	5	5
First	788	571	5	5	10
Second	788	571	5	5	10
Third	587	429	3	4	7
Fourth	538	326	4	2	8
Total	3,549	2,264	17	21	38
			45%	55%	

Layout

- 3.5 The proposed development is arranged to utilise the established access from Arlington Court, whilst presenting a clear principal frontage onto Shepiston Lane. The layout broadly follows the footprint of the existing car park structure, with a modest extension to the front of the site to optimise the use of the land, strengthen the building's presence within the street scene and better reflect its role as a natural extension to the existing hotel complex.
- 3.6 A prominent main entrance is positioned on the Shepiston Lane frontage, creating a clear and welcoming point of arrival for guests and visitors whilst improving legibility across the wider hotel campus. Extensive glazing to the corner elevations introduces activity and visual openness at ground floor level, whilst also responding elegantly to the change in levels across the site. A secondary rear entrance is provided for servicing and day-to-day operational requirements.
- 3.7 The layout sensitively accommodates the existing on-site substation, retaining all necessary access arrangements. A partially sunken lower ground parking level is also retained, ensuring continued parking provision to meet the operational needs of the wider hotel site. Secure cycle parking and electric vehicle charging infrastructure are incorporated to support sustainable travel choices.



- 3.8 Landscape enhancements form an integral component of the site arrangement, including the retention of existing trees where practicable, supplemented by new planting and greening measures that enhance visual amenity, soften the built form and reinforce the quality and character of the Shepiston Lane frontage.
- 3.9 The internal layout has been carefully planned to provide clear, efficient and legible circulation whilst maximising the delivery of high quality guest accommodation. A well-defined reception and lounge at ground floor level creates an immediate sense of arrival from Shepiston Lane, with direct visual connection to the principal entrance and active frontage that contributes to natural surveillance of the public realm. Two circulation cores connected by a central corridor provide short and intuitive routes to all suites, reducing unnecessary travel distances, minimising dead-end corridors and improving overall wayfinding and operational efficiency. The arrangement also enables a balanced distribution of one-bedroom and two-bedroom suites across the building, allowing the accommodation to cater for a broad range of guest needs and lengths of stay.
- 3.10 Plant, storage, luggage handling and wider back-of-house functions are consolidated in discreet locations away from the principal frontages, ensuring that active uses and glazed accommodation address the key public elevations wherever possible. This approach enhances the external appearance of the building whilst supporting efficient day-to-day hotel operations. At lower ground level, retained car parking and secure cycle parking are directly linked to the principal vertical circulation core, providing convenient step-free access to all floors. Suite layouts have been designed to be regular and efficient in form, supporting buildability, long-term flexibility and effective space planning, whilst also securing good levels of daylight, outlook and acoustic separation.
- 3.11 The accommodation will operate as serviced apartments rather than conventional hotel rooms. Accordingly, all suites incorporate in-room kitchen facilities and integrated storage, supported by shared operational services within the wider hotel campus, including laundry and management functions.

Scale and Massing

- 3.12 The proposed building reaches a maximum height of five storeys, however the overall form has been carefully stepped and articulated to present a varied scale across the site, reducing in height to four, three, two and one-and-a-half storeys in the most sensitive locations. This graduated profile significantly reduces perceived bulk, introduces visual relief and enables the development to sit comfortably within its surrounding context. The scale and massing have been carefully calibrated to mediate between the more domestic character of Arlington Court and the larger built and infrastructural setting associated with the M4 corridor and Heathrow Airport. In this respect, the development responds appropriately to the differing characters that surround the site.
- 3.13 Along the northern elevation facing Arlington Court and Elm View House, the building presents a maximum four storey shoulder, with the uppermost fifth floor set back by approximately 2.5 metres to 5 metres from the principal façade line. This approach materially reduces the perception of height and dominance from neighbouring residential properties, whilst assisting in protecting outlook, daylight and privacy.
- 3.14 The massing is arranged as two principal built forms separated by a lower central element, which breaks down the overall composition and avoids a singular monolithic appearance. Toward Shepiston Lane, the corner element is recessed to create a generous entrance feature that enhances legibility and arrival without increasing height. To the north, the building steps down in both height and depth in



direct response to neighbouring residential sensitivities. The stepped roofscape and articulated building form further reduce apparent bulk in wider views, including from Arlington Court, Shepiston Lane and Sam Philp's Recreation Ground opposite. A disciplined architectural rhythm, with slender vertical volumes and well-proportioned openings, provides additional refinement to the elevations and ensures the building reads as an elegant composition of related elements. Overall, the massing strategy achieves an appropriate balance between optimisation of this brownfield site and a sensitive response to adjacent residential and civic buildings.

External Appearance

- 3.15 The architectural approach draws upon a carefully selected range of contemporary precedents which demonstrate how robust brickwork and high-quality pre-cast stone detailing can create enduring and contextually responsive buildings. The design adopts a disciplined composition of well-proportioned openings, subtle façade modelling and carefully considered material junctions, resulting in elevations that are calm, ordered and durable in character.
- 3.16 The external appearance is underpinned by a restrained palette of complementary masonry tones and textures selected for their robustness, longevity and compatibility with the surrounding townscape. Soft red brick forms the principal body of the building, reflecting the prevailing tones of nearby residential development without direct imitation. A darker mid-grey brick is introduced at lower levels to create a strong visual plinth capable of accommodating day-to-day wear whilst grounding the building within the streetscape
- 3.17 High quality reconstituted or pre-cast stone detailing is incorporated to lintels, mullions, parapet copings and key architectural features, providing depth, articulation and a consistent sense of proportion across the elevations. At ground floor level, stone cladding is used selectively to emphasise prominent public-facing elements, including the principal entrance, and to visually tie together the lower and upper building forms. Anthracite powder-coated aluminium is proposed for windows and metalwork, offering crisp and refined profiles that provide subtle contrast to the masonry palette. Recessed window reveals, projecting vertical elements and carefully framed openings introduce shadow, depth and visual interest, ensuring the façades remain elegant at both long and short range.
- 3.18 The proposed typical bay is conceived as a robust and repeatable module that brings coherence to the elevations whilst supporting efficient construction. This consistent rhythm allows the building to read as a unified composition, whilst permitting local variation at corners, entrance points and stepped upper levels.

Landscaping

- 3.19 The landscape strategy has been developed to significantly enhance the appearance, functionality and ecological value of the site. Existing trees are predominantly of limited quality, as identified within the submitted Arboricultural Impact Assessment, and those removals proposed are necessary to facilitate demolition of the existing car park structure and the delivery of the replacement development.
- 3.20 The scheme provides a comprehensive programme of replacement planting, including new specimen trees, understorey landscaping and biodiverse roof areas, which together will deliver a clear qualitative and quantitative improvement over the existing baseline condition. New trees and soft landscaping are focused primarily to the west and north of the building, where planting opportunities have been maximised whilst maintaining safe, attractive and legible pedestrian routes for guests and visitors.



- 3.21 Species selection has been carefully considered to provide biodiversity value, seasonal interest and resilience to the local urban environment. A varied palette of trees and shrubs will create a greener and more attractive setting, whilst supporting pollinators and wider urban wildlife. Complementary low-level planting beneath tree canopies will provide year-round structure, colour and habitat value.
- 3.22 The roofscape will also incorporate biodiverse blue-green roof areas to non-accessible sections of the building. These measures will contribute to urban greening, habitat creation, rainwater attenuation and improved environmental performance.
- 3.23 Consistent paving treatments will clearly define pedestrian routes across the site, with secure short-stay cycle parking positioned close to the entrance to encourage sustainable travel choices.

Accessibility

- 3.24 The development has been designed to provide inclusive and accessible accommodation for a wide range of users. Five accessible suites are proposed, equating to 13% of the total. These accessible suites incorporate generous circulation spaces suitable for wheelchair users, fully accessible bathrooms, compliant door widths and layouts, together with accessible controls, fixtures and fittings to ensure safe, convenient and comfortable occupation. The accessible accommodation is distributed across the building rather than concentrated in a single location, providing greater choice, flexibility and parity of experience for guests. This approach also assists in ensuring that accessible rooms are integrated naturally within the wider accommodation offer. In addition, a degree of flexibility has been incorporated into the wider layout to enable future adaptation of standard suites should accessibility requirements evolve over time.

Access and Parking

- 3.25 The development has been designed to integrate efficiently with the established access and parking arrangements serving the wider hotel complex. Vehicular access will continue to be taken from Arlington Court, utilising the existing route to the retained lower ground parking level.
- 3.26 A total of 26 car parking spaces will be retained at lower ground floor level to serve the operational needs of the wider hotel site, including the proposed apart-hotel accommodation. Of these, two spaces will be designated as accessible bays, designed with the additional dimensions required to ensure convenient and inclusive use by disabled guests and visitors. Full details of parking demand and operational suitability are provided within the submitted Transport Statement.
- 3.27 Provision is also made for a dedicated drop off bay capable of accommodating two vehicles close to the principal entrance. This will provide convenient short-stay access for taxis, private hire vehicles and guest arrivals, improving the overall arrival experience and supporting efficient day-to-day operation of the hotel complex. Minor works within Arlington Court, which is under the applicant's control, will facilitate this arrangement, together with the provision of a new pavement along the southern side to ensure safe and convenient pedestrian movement.
- 3.28 Cycle parking has been determined having regard to both residential and hotel standards within the London Plan, reflecting the hybrid serviced apartment nature of the accommodation. Given the shorter average lengths of stay and lower levels of long-term cycle ownership typically associated with this form of use, an appropriate blended level of provision is proposed:



- 4no. short-stay spaces are located adjacent to the main entrance
- 10no. long-stay spaces are located in the lower ground car park

3.29 Accordingly, four short-stay cycle spaces will be positioned adjacent to the main entrance for visitors and guests, with ten secure long-stay spaces located within the lower ground parking level for staff and longer-stay occupants.

Refuse and Servicing

3.30 The proposed apart-hotel has been designed to operate as an extension to the existing Mercure Hotel complex, with the principal back-of-house functions continuing to be accommodated within the established hotel building. Core facilities such as kitchens, laundry and wider management operations are already centrally provided on site, meaning that the majority of servicing activity will continue through the existing arrangements with no material intensification arising solely from the new accommodation block.

3.31 In terms of refuse provision, waste generation has been assessed having regard to comparable residential benchmarks, with an appropriate adjustment (of 15%) to reflect the shorter-stay nature of serviced apartment occupation and managed housekeeping arrangements. On this basis, the development can be appropriately served through the provision of four additional 1,100 litre Eurobins. .

3.32 Any servicing requirements specific to the proposed building will be undertaken discreetly from the rear service entrance, ensuring a clear separation between operational activity and the principal guest entrance on Shepiston Lane. This approach maintains an efficient servicing arrangement whilst preserving the quality of the public-facing frontage and arrival experience.

3.33 Mail, parcel and smaller delivery vehicles will be able to utilise the dedicated drop-off area close to the main entrance, with deliveries managed securely through the reception and office functions. The existing on-site electricity substation will remain fully accessible at all times, with direct 24-hour access retained for UK Power Networks.

Sustainability

3.34 The proposed development has been designed in accordance with the Mayor of London's energy hierarchy of Be Lean, Be Clean and Be Green, adopting a fabric-first approach that prioritises reducing energy demand before introducing efficient building systems and on-site renewable energy generation. Energy demand is minimised through high-performance insulation, efficient glazing, strong airtightness standards and passive design measures which help regulate internal temperatures and reduce overheating risk. The layout and façade design have also been carefully considered to manage solar gain and optimise occupant comfort. Efficient building services will be provided through low-carbon heat pump technology, including hybrid VRF systems for heating and cooling, together with mechanical ventilation and heat recovery to improve energy performance and indoor air quality. Renewable energy will be delivered through roof-mounted photovoltaic panels, generating on-site electricity and helping to offset operational energy demand. Further sustainability measures include water-efficient fittings targeting consumption below 105 litres per person per day, blue-green roof systems to assist with sustainable drainage and biodiversity, dedicated recycling facilities, and careful material selection to reduce embodied carbon and construction waste.



Lighting

- 3.35 The proposed lighting strategy has been designed to provide safe, efficient and attractive illumination for the development whilst carefully protecting neighbouring residential amenity, particularly in relation to Elm View House to the north. All external lighting will utilise high-efficiency LED fittings with warm colour temperatures to reduce glare, harshness and unnecessary light spill. Lighting will be carefully directed and shielded to ensure illumination remains focused within the site and does not adversely affect surrounding properties or the wider streetscape.
- 3.36 Functional lighting will be provided to pedestrian routes, entrances, parking areas and servicing spaces to ensure safe movement for guests, visitors and staff during hours of darkness. Particular emphasis will be given to the principal entrance and drop-off areas, where enhanced lighting levels will support legibility, security and ease of arrival. Lighting within the retained lower ground parking area will also be designed to provide a safe and well-managed environment. Architectural lighting to the building frontage will be subtle and understated in character, intended to reinforce the quality of the entrance and principal elevations rather than create excessive visual prominence. This will help establish a welcoming sense of arrival and support natural surveillance at ground floor level. Any future signage illumination will be subject to separate consent where required, but would be designed to be discreet, downward-facing and fully shielded.



4.0 Planning Policy Context

- 4.1 The proposals have taken account of the relevant national, regional and local planning policies that form the statutory and material context for this application. This section provides a summary of the planning framework relevant to the assessment of the development and preparation of this planning statement.
- 4.2 In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise.

The Development Plan

- 4.3 For the purposes of this application, the relevant adopted development plan comprises the following documents:
- The London Plan, 2021
 - Hillingdon Local Plan: Part 1 - Strategic Policies (2012)
 - Hillingdon Local Plan: Part 2 - Development Management Policies (2020)
 - Hillingdon Local Plan: Part 2 - Site Allocations and Designations (2020)
- 4.4 Relevant policies relating to the proposal are:
- PT1.BE1 Built Environment
 - PT1.E1 Managing the Supply of Employment Land
 - PT1. E2 concerns the Location of Employment Growth
 - PT1.EM7 Biodiversity and Geological Conservation
 - DMTC 1 Town Centre Developments
 - DMCI 7 Planning Obligations and Community Infrastructure Levy
 - DMEI 10 Water Management, Efficiency and Quality
 - DMEI 11 Protection of Ground Water Resources
 - DMEI 12 Development of Land Affected by Contamination
 - DMEI 14 Air Quality
 - DMEI 2 Reducing Carbon Emissions
 - DMEI 3 Decentralised Energy
 - DMEI 7 Biodiversity Protection and Enhancement
 - DMEI 9 Management of Flood Risk
 - DME 4 Visitor Attractions
 - DME 5 Hotels and Visitor Accommodation
 - DMHB 7 Archaeological Priority Areas and archaeological Priority Zones
 - DMHB 11 Design of New Development
 - DMHB 12 Streets and Public Realm
 - DMHB 14 Trees and Landscaping
 - SEA 2 Hotel and Office Growth Locations
 - LPP E2 Providing suitable business space
 - LPP D1 (2021) London's form, character and capacity for growth
 - LPP D12 Fire safety



- LPP D13 Agent of change
- LPP D14 Noise
- LPP D3 Optimising site capacity through the design-led approach
- LPP D5 Inclusive design
- LPP D8 Public realm
- LPP G5 Urban greening
- LPP GG2 Making the best use of land
- LPP SI1 Improving air quality
- LPP SI12 Flood risk management
- LPP SI13 Sustainable drainage
- LPP SI2 Minimising greenhouse gas emissions
- LPP T5 Cycling
- LPP T6 Car parking
- LPP T7 Deliveries, servicing and construction

Emerging Local Plan

- 4.5 The Council is currently progressing a review of the Hillingdon Local Plan. The existing adopted Local Plan remains the statutory development plan for decision-making purposes; however, work is underway to prepare a replacement plan which will guide future growth and development across the Borough. The first stage of consultation, being a Call for Views (Regulation 18) exercise, concluded on 24 June 2024. This initial stage sought stakeholder views on issues, opportunities and priorities to inform the new plan. The Council has also begun publishing supporting evidence base documents, including studies relating to townscape and character, employment land capacity and town centres.
- 4.6 The Council launched a call for sites exercise to gather information on land that individuals or organisations may consider to have development potential. This exercise ran from Friday 26 May to Friday 29 September 2023, and as part of the Regulation 18 consultation from 29 April to 24 June 2024.
- 4.7 Following approval of a revised programme by Full Council on 22 January 2026, the Council has confirmed that the Local Plan Review will now proceed under the forthcoming new plan-making system. The published timetable identifies the following next stages:
- Scoping Consultation – Q1 / Q2 2026
 - Draft Plan Consultation – Q3 / Q4 2026
 - Proposed Submission Consultation – Q2 / Q3 2027
 - Examination Commencing – Q4 2027
- 4.8 Accordingly, the emerging Local Plan remains at an early stage of preparation, with no draft policy wording yet published for consultation. As such, it carries limited weight in the determination of planning applications at the present time. Nevertheless, the review process demonstrates the Council's ongoing commitment to ensuring an up-to-date planning framework capable of responding to future housing, employment, infrastructure and environmental needs across the Borough.

National Planning Policy Framework (NPPF)

- 4.9 The NPPF was adopted in December 2024 and is a key material consideration in the determination of planning applications. The NPPF sets out the Government's objectives for achieving sustainable development.



- 4.10 The consultation draft NPPF was published on 16 December 2025, with the consultation period closing on 10 March 2026. The draft represents a substantial update to national planning policy, setting out a clear direction towards creating a more efficient and responsive planning system.

Other Material Considerations

- 4.11 Supplementary planning documents (SPDs) and guidance have been reviewed and considered in the preparation of the proposals. These include:
- National Planning Practice Guidance (various dates)
 - Planning Obligations, adopted 2014
 - Accessible Hillingdon, adopted 2017



5.0 Considerations

5.1 Section 38(6) of the Planning Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. This section therefore assesses the proposal against the development plan policies outlined above and examines relevant material considerations where appropriate. The assessment draws upon the suite of application documents listed at Section 1 of this statement. The main planning considerations are:

- Principle of development;
- Design;
- Quality of accommodation;
- Amenity; and
- Highways.

5.2 Further technical matters that are addressed in supporting reports include:

- Air quality;
- Noise;
- Flood risk;
- Biodiversity and trees;
- Urban greening factor;
- Energy;
- Fire; and
- Airport safeguarding.

5.3 Each matter is considered below.

Principle of Development

Provision of New Hotel Accommodation and Redevelopment of Existing Car Park

5.4 London Plan Policy E10 supports the strengthening of London's visitor economy and the delivery of additional hotel accommodation, including in well-connected outer London locations. At a local level, Policy E2 of the Hillingdon Local Plan seeks to accommodate at least 3,800 additional hotel bedrooms, with Hayes identified as a key growth area. Policy DMTC1 applies the sequential test to main town centre uses, whilst Policy DME5 supports visitor accommodation in accessible and sustainable locations, subject to high quality design and no unacceptable impacts. In addition, Policy SEA2 identifies Hayes as a focus for hotel growth, reinforcing the suitability of the location for this type of development.

5.5 The application site forms part of the long-established Mercure Hotel complex and occupies a highly sustainable location closely connected to Heathrow Airport, one of the most significant economic and visitor destinations in the country. The proposal seeks to redevelop an outdated multi-storey car park structure to provide 38 apart-hotel suites, increasing the operational hotel offer from 184 rooms to 222 rooms. This represents the efficient reuse of previously developed land within an existing hotel campus.



- 5.6 In addition, the proposal has been subject to a robust and proportionate Sequential Test in accordance with Policy SD7 of the London Plan, Policy DMTC1 of the Hillingdon Local Plan and paragraphs 91–92 of the NPPF. The assessment confirms that there are no suitable or available in-centre or edge-of-centre sites within Hayes or West Drayton Town Centres, as well as Southall, Hounslow, Feltham and Staines, capable of accommodating the scale, format and operational requirements of the proposed development. A wider review of additional centres has also been undertaken, demonstrating that these locations would not represent realistic or commercially viable alternatives, particularly having regard to the clear locational requirements associated with Heathrow-related hotel demand.
- 5.7 The findings reflect the well-established principle within national policy and guidance that certain main town centre uses, including hotels, may have specific market and locational requirements. In this case, the proposed development is intrinsically linked to the existing Mercure Hotel and its function in serving Heathrow Airport. The proposal cannot reasonably be disaggregated and must be considered as an extension to an established hotel campus, sharing operational infrastructure, staffing and facilities. On this basis, and having demonstrated flexibility in scale and format, the Sequential Test is clearly satisfied. The application site represents the most suitable and deliverable location for the proposed development, reinforcing the in-principle acceptability of the scheme in accordance with the development plan.
- 5.8 The Council's pre-application response also confirmed that a hotel building in this location is not objected to in principle, noting the previous permission for hotel extension floorspace under ref. 382/APP/2014/1117. It should be noted that this earlier permission was not supported by a sequential test. Whilst that permission has now lapsed, the current scheme builds positively on this broadly accepted fallback position, delivering a significantly improved design solution and a more efficient use of the site.
- 5.9 The redevelopment of the existing car park to provide additional hotel accommodation accords with London Plan Policy E10, which supports visitor infrastructure and the maintenance of a sufficient supply of serviced accommodation, together with Hillingdon Local Plan Policy E2 and Policy DME5, which support new hotel provision in sustainable Heathrow-related locations. The scheme also optimises previously developed land within an established commercial use and supports the continued operation and long-term vitality of the wider Mercure Hotel complex.
- 5.10 To conclude, the redevelopment of the existing car park to provide additional hotel accommodation accords with London Plan Policy E10 and Hillingdon Local Plan Policies E2, DME5 and SEA2, which support the provision of visitor accommodation in sustainable, Heathrow-related locations, including Hayes as a key growth area. The proposal also represents the efficient reuse of previously developed land within an established hotel campus. A Sequential Test has been undertaken in accordance with London Plan Policy SD7, Policy DMTC1 and the NPPF, demonstrating that there are no suitable or available in-centre or edge-of-centre sites capable of accommodating the development, and that the proposal is therefore policy compliant in this respect.

Design

- 5.11 Paragraphs 131 and 135 of the NPPF confirm that high quality and attractive design is fundamental to sustainable development and that development should add to the overall quality of an area, be visually attractive, sympathetic to local character and establish a strong sense of place.
- 5.12 London Plan Policy D3 requires a design-led approach that optimises site capacity, ensuring development is of the most appropriate form for its context. Local Plan Policy BE1 seeks development that improves the quality of the built environment, whilst Policy DMHB11 requires schemes to respond



positively to local context in terms of scale, height, massing, materials, layout and landscaping. Policy DMHB12 further seeks development that is well integrated with the surrounding area and accessible.

- 5.13 The submitted proposals have been carefully evolved through the pre-application process and directly respond to the Council's design comments. The earlier six storey concept has been substantially refined and reduced, with the current scheme presenting a maximum five storey building with a carefully stepped profile ranging between lower elements and upper set-back storeys. This materially reduces perceived bulk and creates a more composed and contextual form. Please refer to the Design and Access statement for comprehensive details of how the proposals have evolved.

Height, Scale and Massing

- 5.14 The Council's pre-application feedback indicated that a refined five storey approach could be acceptable where supported by strong design justification. The submitted scheme has responded positively through a comprehensive redesign, delivering a carefully moderated built form. The northern elevation facing Elm View House presents a reduced apparent scale, with the upper floor stepping back between 2.5 metres and 5 metres from the principal façade line. This successfully lessens visual presence, softens the roofscape and secures an improved relationship with neighbouring occupiers.
- 5.15 The massing is broken into two principal volumes separated by a lower central section, ensuring the building reads as a series of related forms rather than a monolithic block. The corner element to Shepiston Lane is carved back to frame the entrance and reinforce legibility without increasing height. This design-led approach successfully balances optimisation of this brownfield site with a sensitive response to adjacent residential and civic uses.

Relationship to Surroundings

- 5.16 The scheme has been specifically calibrated to sit between the domestic scale of Arlington Court and the larger commercial and infrastructure context associated with the M4 corridor and Heathrow Airport. It is therefore entirely reasonable that the building adopts a stronger urban presence than nearby housing, whilst still transitioning appropriately toward residential neighbours.
- 5.17 The south elevation has also been fully resolved as an attractive standalone façade, ensuring it performs positively in views from Shepiston Lane and remains capable of sitting comfortably alongside any future redevelopment of the adjoining fire station site.

Architectural Quality and Materials

- 5.18 The external appearance is underpinned by a restrained palette of complementary masonry tones and textures, chosen for their robustness, longevity and compatibility with the surrounding context. Soft red brick with light red mortar forms the main body of the building, echoing local residential forms without direct imitation. A mid-grey brick with light grey mortar defines the ground-level plinth, providing a visually solid base that can better accommodate scuffing and day-to-day wear. A mid-grey GeoBrick natural stone cladding is used to the ground floor fascia, marking key public-facing elements such as the entrance and tying together the ground and upper volumes. Light grey pre-cast stone lintels, mullions and parapet copings introduce a consistent horizontal and vertical order, reinforcing the building's proportions and providing a durable, low-maintenance finish at vulnerable edges. Anthracite PPC aluminium is specified for windows and metalwork, offering fine, crisp profiles and a subtle contrast to the surrounding masonry. This approach gives the building rhythm and elegance, reducing visual bulk and delivering a contemporary but enduring architectural character.

*Frontage, Public Realm, Plant, Lighting and Roofscape*

- 5.19 The Council sought a more welcoming and legible entrance. In response, the principal entrance has been relocated and strengthened at the prominent corner of Shepiston Lane and Arlington Court, with generous glazing, active reception frontage and improved natural surveillance. The existing back-of-house appearance is replaced with a clear gateway to the wider Mercure campus.
- 5.20 Landscaping has also been significantly enhanced through replacement tree planting, structured soft landscaping, biodiverse roofs and improved pedestrian routes, creating a greener and more attractive setting than the current car park environment.
- 5.21 Roof plant has been integrated within the architectural composition and set back from the building edges, ensuring it remains visually recessive. Screened enclosures and coordinated roof design prevent undue prominence.
- 5.22 A detailed lighting strategy in the Design and Access Statement advises the use of warm LED fittings, shielded luminaires and controlled light spill to provide safe illumination whilst protecting neighbouring amenity.
- 5.23 The proposal fully addresses the Council's pre-application design comments through a reduced and refined building form, improved entrance sequence, stronger landscaping strategy and higher quality architectural treatment. The result is a well composed and policy compliant development that transforms an obsolete car park into an attractive and permanent addition to the Mercure Hotel complex, in accordance with the NPPF, London Plan Policy D3, and Hillingdon Policies BE1, DMHB11 and DMHB12.

Quality of Accommodation

- 5.24 Paragraph 135(f) of the NPPF requires development to secure a high standard of amenity for existing and future users. London Plan Policies D6, D5 and E10 similarly seek high quality, inclusive and well-designed accommodation. Whilst there are no specific adopted space standards for hotel bedrooms, the quality of accommodation remains an important material consideration.
- 5.25 The proposed development has been specifically designed to provide a high quality serviced apartment offer rather than conventional short-stay hotel rooms. The accommodation will comprise a mix of 38 self-contained one bedroom and two bedroom suites, each incorporating clearly defined sleeping, living and kitchen areas to support longer stay business, family and leisure visitors associated with Heathrow Airport. This form of accommodation provides a materially higher standard of internal amenity than a typical hotel room.
- 5.26 The submitted Design and Access Statement confirms that suite sizes range from approximately 39 sq.m to 49 sq.m for one bedroom units and 61 sq.m to 87 sq.m for two bedroom units. These are generous floor areas when compared to typical airport hotel accommodation. The standard hotel rooms (not suites) in the UK typically range from 15–37 sq. m NSA, with sizes increasing by star rating and location. Airport hotels like those near Heathrow often hit midscale norms of 25–33 sq. m to balance efficiency and guest comfort for short stays. The proposal broadly align with, or exceed, relevant residential benchmarks (such as NDSS). This demonstrates the strong quality of accommodation proposed throughout the scheme.



- 5.27 Layouts have been carefully planned to provide usable, well-proportioned spaces with clear circulation, integrated storage and good levels of functionality. Large windows to principal living spaces secure strong levels of daylight and outlook, whilst the internal arrangement ensures a comfortable environment suited to short to medium-term occupation. Durable finishes, good acoustic separation and high thermal performance will further enhance guest comfort.
- 5.28 The Council's pre-application comments raised queries regarding a limited number of internalised bedroom areas within some suites. This matter has been carefully considered through the evolved design. Such arrangements are limited in number, are contained within larger self-contained suites with generous open-plan living areas enjoying full external glazing, and reflect the flexible apart-hotel model rather than permanent residential accommodation. Mechanical ventilation systems are incorporated to ensure appropriate ventilation, comfort and environmental performance. In the context of short to medium stay occupation and the overall generous suite quality, these layouts are considered entirely acceptable.
- 5.29 The scheme has also been positively amended to respond to the Council's accessibility comments. A total of five accessible suites are proposed, equating to approximately 13% of all accommodation, thereby exceeding the minimum 10% policy expectation. These suites are distributed throughout the building to provide genuine choice and inclusive access for guests. Accessible rooms incorporate compliant circulation space, step-free access, accessible bathrooms and fittings designed to current standards. The building will also provide lift access and inclusive means of escape in accordance with Building Regulations and fire safety requirements, with these matters secured through the detailed design stage.
- 5.30 Overall, the proposal delivers high quality, spacious and well-planned serviced accommodation that exceeds the standard typically associated with conventional airport hotel rooms. The scheme responds positively to the Council's pre-application comments, including accessibility and internal layout matters, and will provide a strong standard of amenity for future guests. Accordingly, the development accords with paragraph 135(f) of the NPPF together with London Plan Policies D5, D6 and E10.

Amenity

- 5.31 Local Plan Policy DMHB11 seeks to ensure that development does not result in unacceptable harm to the amenities of adjoining occupiers, including impacts relating to outlook, privacy, daylight, sunlight and noise. Paragraph 135(f) of the NPPF similarly requires development to secure a high standard of amenity for existing and future users.
- 5.32 The application has been carefully evolved through the pre-application process, with the earlier concept substantially refined in height, massing and layout to secure an appropriate relationship with neighbouring properties, particularly Elm View House to the north. The current proposal presents a reduced five storey scheme with upper levels stepped back and the built form carefully moderated at sensitive interfaces.

Daylight, Sunlight and Outlook

- 5.33 The Council's pre-application comments requested a full technical assessment of potential impacts on neighbouring occupiers. In response, a comprehensive Daylight and Sunlight Assessment has been prepared in accordance with the BRE Guidelines. The assessment confirms that the proposal performs well overall, all neighbouring properties, including 2, 4, 6 and 8 Carlton Avenue, fully comply with BRE guidance and experience negligible effects. Elm View House (the closest receptor) is the



only property where limited, localised reductions in VSC are identified, with 84% of windows tested meeting the guideline and 97% of rooms remaining compliant. The overall daylight and sunlight effect is therefore categorised as negligible, with only a single receptor experiencing minor adverse effects in isolated instances, which is typical and acceptable within an urban context. The report further notes that the scheme has undergone five design iterations, specifically focused on refining the massing adjacent to sensitive receptors and safeguarding neighbouring amenity. Given the stepped upper floors, moderated northern elevation and favourable technical results, the relationship in terms of outlook and enclosure is considered acceptable and policy compliant

Privacy and Overlooking

- 5.34 The Council raised concerns regarding overlooking toward Elm View House. This matter has been directly addressed through the redesign process. The building has been reduced in height, upper floors set back and window relationships carefully considered. The proposed suites form part of professionally managed serviced accommodation rather than conventional permanent housing, with transient patterns of occupation and no private balconies facing neighbouring homes. In this context, the relationship is considered acceptable and comparable to many urban hotel and residential interfaces across London. No material or unacceptable overlooking would arise. Please refer to the Design and Access Statement (page 38), which demonstrates that the 25 degree standard is achieved.

Noise and Disturbance

- 5.35 The site forms part of an established hotel campus which has operated for many years alongside neighbouring residential properties. Hotel activity, guest movements and servicing are therefore long-standing characteristics of the area. The proposal represents an extension to that existing use rather than the introduction of a materially different activity.
- 5.36 As detailed below in the technical report section, a Noise and Vibration Assessment accompanies the application and confirms that the development can operate without unacceptable impacts on neighbouring occupiers, in accordance with London Plan Policies D13 and D14, subject to standard mitigation. The assessment identifies road traffic from the M4 as the dominant noise source and demonstrates that, through good acoustic design, building orientation and appropriate façade treatments, a suitable internal environment can be achieved. Vibration effects are not identified as a constraint and would not give rise to any material amenity impacts. The design also incorporates an appropriate ventilation and overheating strategy, ensuring that comfortable internal conditions can be maintained without reliance on open windows in higher noise locations. Plant equipment will be modern, acoustically controlled and appropriately located within screened roof and service areas, with servicing remaining integrated within the wider hotel operation, thereby limiting additional disturbance.
- 5.37 The proposal has been carefully refined to protect neighbouring amenity and is supported by robust technical evidence. Daylight and sunlight impacts are limited and acceptable, privacy is appropriately managed, and noise can be satisfactorily mitigated through design and operation. Accordingly, the development accords with paragraph 135(f) of the NPPF and Policy DMHB11 of the Hillingdon Local Plan.

Highways

- 5.38 NPPF Paragraph 116 confirms that development should only be refused on highways grounds where there would be an unacceptable impact on highway safety, or where the residual cumulative impacts on the road network would be severe. London Plan Policies T2, T4, T5, T6 and T7 seek development



that prioritises healthy streets, mitigates transport impacts, promotes cycling, provides proportionate parking and ensures safe servicing arrangements. At local level, Policies DMT1, DMT2, DMT5 and DMT6 of the Hillingdon Local Plan require proposals to provide suitable access, avoid undue traffic impacts and incorporate appropriate parking and cycle provision.

- 5.39 The application has been designed squarely within this policy framework and is supported by a detailed Transport Assessment, Servicing and Waste Management Plan, and Design and Construction Method Statement.

Existing Access and Safe Operation

- 5.40 In accordance with Policies DMT1, DMT2 and London Plan Policy T4, the development utilises the established vehicular access from Shepiston Lane via Arlington Court, which already safely serves the Mercure Hotel. No new access point onto the public highway is required, thereby minimising intervention to the highway network and relying on a proven operational arrangement. The retention of an existing access route ensures the scheme can operate safely and efficiently without prejudicing pedestrian or vehicular safety.

Parking Provision

- 5.41 London Plan Policy T6 promotes restraint in parking provision, particularly where sites benefit from existing transport connections, whilst allowing a case by case approach for hotel uses. Hillingdon Policy DMT6 similarly requires parking levels to reflect operational need whilst avoiding unnecessary oversupply. The proposal responds positively to this policy position. The existing hotel currently provides 184 rooms, and the scheme introduces 38 additional serviced units, resulting in 222 rooms across the wider site. Following redevelopment, 68 parking spaces would remain available across the hotel campus, including 26 within the new building, equating to approximately 0.3 spaces per room. This represents a balanced car lite approach that rationalises surplus parking land, supports more efficient land use, and still retains sufficient capacity for guests, staff and operational needs. Accessible bays and EV charging infrastructure are also incorporated, consistent with London Plan Policy T6.

Highway Impact and Trip Generation

- 5.42 London Plan Policy T4 requires transport impacts to be properly assessed and mitigated. The TRICS data provided that the proposed development is expected to generate a limited number of vehicle movements, with approximately 10 vehicle trips during the morning peak hour and 7 vehicle trips during the evening peak hour. These movements are modest in scale and will not result in any material impact on the surrounding highway network. The submitted Transport Assessment demonstrates that the proposal forms part of an existing hotel operation and will not generate severe or unacceptable impacts on the surrounding road network. Many trips will be linked to existing hotel activity, Heathrow-related stays, taxi use and shared site operations.

Walking, Cycling and Sustainable Travel

- 5.43 Pedestrian access to the Site is provided via the surrounding footway network along Arlington Court Shepiston Lane and the adjoining residential streets. These routes provide safe pedestrian connections to surrounding residential areas, local amenities and public transport facilities. Hayes & Harlington Station is located approximately 1.4km to the north-east of the Site, providing rail services on the Elizabeth Line and Great Western Railway network, offering direct connections to Heathrow Airport, Central London and destinations across the wider region.



- 5.44 London Plan Policies T2 and T5 require development to encourage walking and cycling and reduce car dependency. Cycle parking has been considered as part of the proposed development to support staff and visitors travelling to the Site by bicycle. Cycle parking has been derived having regard to both residential (C3) and hotel (C1) standards in the London Plan. Given the serviced nature of the apart-hotel, shorter average lengths of stay, and lower levels of long-term cycle ownership compared to permanent residential use, a level of provision between the two standards is proposed. In response, the proposal includes:
- 4 short-stay cycle spaces adjacent to the entrance
 - 10 long-stay cycle spaces within the lower ground floor
 - safe pedestrian connections through the existing hotel campus to Shepiston Lane and nearby public transport links.

- 5.45 These measures support staff and visitor sustainable travel choices and align with Healthy Streets principles.

Servicing, Deliveries and Construction Phase

- 5.46 London Plan Policy T7 requires safe, clean and efficient servicing with off-street loading wherever possible. Hillingdon Policies DMT1 and DMT2 seek to avoid congestion and highway obstruction. The proposal fully accords with these objectives. All deliveries, refuse collection and servicing will take place within the site using the established internal road network, with vehicles able to turn and exit in forward gear. The Servicing and Waste Management Plan confirms only modest additional demand, estimated at around 5 LGVs per day with occasional larger vehicle visits. Deliveries will be managed outside peak periods where practicable through booking and coordination procedures. The proposed waste management strategy provides a suitable and policy-compliant solution, with sufficient on-site capacity for the storage and segregation of refuse and recycling in accordance with the requirements of the Hillingdon Local Plan. Waste collection will continue to be undertaken by private contractors from within the site, with collection frequencies adjusted as necessary to prevent accumulation.
- 5.47 London Plan Policy T7 also supports Construction Logistics Plans for major development. A detailed construction management strategy accompanies the application and demonstrates that routing, contractor parking, deliveries, dust, noise and pedestrian safety can be effectively managed throughout the build programme.
- 5.48 The proposal delivers a policy compliant transport solution that makes efficient use of previously developed land whilst retaining safe and effective site operation. It provides proportionate parking, enhanced cycle facilities, managed servicing and no severe highway impacts. The scheme therefore accords with paragraph 116 of the NPPF, London Plan Policies T2-T7, and Hillingdon Local Plan Policies DMT1, DMT2, DMT5 and DMT6.

Technical Assessments

- 5.49 The application is also supported by a series of technical assessments. These should be reviewed by the relevant consultees. A summary of the conclusions on these matters is as follows:
- **Air Quality:** London Plan Policy SI1 and Policies EM8 and Local Plan DME1 14 require development to be air quality neutral, avoid worsening local conditions and protect existing and future receptors. The submitted Air Quality Assessment confirms baseline pollutant levels are within relevant objectives, the proposal will generate only negligible traffic-related effects, and there is no material constraint to the proposed use. The development utilises all-electric



building systems with no on-site combustion plant and delivers a net reduction in parking provision, resulting in Air Quality Neutral compliance for both building and transport emissions. Construction effects can be appropriately managed through standard mitigation and a Dust Management Plan.

- **Noise and Vibration:** In accordance with London Plan Policies D13 and D14, together with Policy EM6 of the Hillingdon Local Plan, a detailed Noise Impact Assessment confirms the site can be developed for hotel use without giving rise to unacceptable acoustic impacts, subject to standard mitigation measures. The assessment identifies the M4 motorway as the principal existing noise source, with aircraft noise and intermittent fire station activity not considered to be governing constraints. The proposed layout has been positively designed to respond to this context, with the majority of noise-sensitive accommodation orientated towards quieter elevations, thereby embedding good acoustic design principles at the outset. Enhanced glazing, appropriate façade insulation and a suitable ventilation / overheating strategy are recommended where required, demonstrating that internal noise levels can meet relevant standards. In respect of plant and servicing noise, the report confirms that mechanical equipment can be specified and controlled so that emissions remain below prevailing background sound levels at nearby residential receptors, consistent with BS4142 guidance. Vibration is not seen as a constraint. Subject to detailed design and any reasonable planning conditions, the proposal is therefore acceptable in noise and amenity terms and fully accords with the Agent of Change principle.
- **Flood Risk:** In accordance with London Plan Policies SI12 and SI13, together with Hillingdon Local Plan Policies EM6, DMEI 9 and DMEI 10, the submitted Flood Risk Assessment confirms the site lies within Flood Zone 1 and is at low risk from fluvial, tidal, reservoir, sewer and canal flooding. The proposed development is therefore sequentially appropriate, with all vulnerable accommodation located above lower ground level. A comprehensive SuDS strategy is proposed, including blue/green roof attenuation and controlled discharge to the surface water network, delivering a substantial betterment over the existing brownfield arrangement. Runoff is restricted to 1.15 l/s, representing an approximate 99% reduction in peak discharge, with capacity designed for the 1 in 100 year storm event plus climate change allowance.
- **Biodiversity and Trees:** The proposal responds positively to London Plan Policies G5, G6 and G7, together with Policy DMHB 14, which seek high quality urban greening, biodiversity enhancement and appropriate tree retention. The submitted Arboricultural Impact Assessment identifies the existing tree stock as comprising three Category B trees, two Category C trees and one Category U group located within the existing hard surfaced car park environment. The proposed removals are limited to those necessary to facilitate the redevelopment and are not considered to result in any notable adverse impact on wider visual amenity or landscape character. In response, the scheme incorporates replacement tree planting, enhanced soft landscaping and biodiverse blue/green roofs, transforming the site from a largely hard surfaced and underutilised area into a significantly greener and more biodiverse environment. These measures will enhance urban greening, biodiversity value, visual amenity and sustainable drainage performance, whilst delivering a clear ecological and landscape improvement over the existing baseline condition.
- **Urban Greening Factor:** London Plan Policy G5 requires major developments to integrate urban greening measures, including landscaping, trees, green roofs, green walls and sustainable drainage, with a target Urban Greening Factor score of 0.3 for predominantly commercial schemes. The proposed development achieves an Urban Greening Factor (UGF) score of 0.33, which exceeds the Mayor of London's recommended target of 0.3. The scheme



has sought to maximise urban greening opportunities within the practical and operational constraints of the site. Extensive green roof provision has been incorporated across the majority of available roof areas, carefully balanced against necessary fire break requirements, parapet maintenance zones, plant access and servicing requirements, and the need to minimise roof build-up to avoid unnecessary height and neighbouring daylight/sunlight impacts. At ground level, permeable paving has been used extensively throughout the surrounding hard landscaping and circulation areas, alongside areas of soft landscaping where operationally feasible. Certain areas of hardstanding necessarily remain to safely accommodate servicing, refuse collection, vehicle manoeuvring and accessible access requirements associated with the hotel operation. Overall, the scheme delivers a strong greening response in excess of strategic policy expectations for this type of development and represents a significant enhancement over the existing predominantly hard surfaced car park condition.

- **Energy:** The proposal has been assessed through a detailed Energy and Sustainability Statement and responds positively to London Plan Policy SI2 and Hillingdon Policy DMEI 2. The scheme follows the required Lean, Clean, Green, Be Seen energy hierarchy and delivers a strong sustainability outcome. The submitted assessment confirms a 56.6% reduction in regulated carbon emissions beyond the Part L 2021 baseline, comfortably exceeding London Plan requirements. Including unregulated energy use, the scheme secures an overall 47.4% reduction in total emissions. These savings are achieved through a high-performance fabric, efficient VRF heating and cooling, heat pump hot water systems, heat recovery ventilation and a 29.48kWp rooftop photovoltaic array generating approximately 24,300kWh per annum. The accompanying BREEAM pre-assessment also identifies the scheme as capable of achieving an Excellent rating, further demonstrating compliance with wider sustainability objectives. Overall, the proposal represents a robust and policy compliant low carbon development.
- **Fire:** The application is supported by a Fire Statement in accordance with London Plan Policy D12. The report confirms the development can achieve a high standard of fire safety through compliant design, robust evacuation measures and appropriate emergency access. The scheme provides two protected stair cores, evacuation lifts, refuge areas, and a full Category L1 fire alarm system, ensuring safe escape for all occupants, including disabled users. Automatic suppression is provided within all suites, alongside fire resisting construction and compliant external materials. Fire appliance access is available from Shepiston Lane and Arlington Court, with an existing hydrant close to the site. Overall, the proposal demonstrates that fire safety has been integral to the design process and accords with Policy D12.
- **Airport Safeguarding:** An Aviation Safeguarding Assessment has been prepared in accordance with NPPF Paragraph 102 and Local Policy DMAV1. The submitted assessment confirms that the proposed development would not result in unacceptable impacts on airport safeguarding, including obstacle limitation surfaces, flight procedures, radar, lighting, glint and glare, or bird strike risk, and that the development can be delivered safely subject to standard safeguarding measures and planning conditions. Heathrow Airport Ltd has also provisionally confirmed that the operational impacts are acceptable.



6.0 Conclusions

- 6.1 The proposed development represents a carefully considered extension to the established Mercure Hotel operation and should be assessed within the context of an existing, operational hotel complex serving Heathrow Airport and the wider visitor economy.
- 6.2 The application has evolved materially since pre-application stage and responds directly to the Council's feedback. In particular, the scheme has been reduced in scale through the removal of a full storey and reduction in room numbers, alongside substantial refinement to the massing, architecture, entrance sequence and relationship with neighbouring development.
- 6.3 The proposal delivers a number of important planning benefits, including:
- Additional hotel/aparthotel accommodation supporting Heathrow-related economic activity;
 - Investment into an underutilised part of the wider hotel site;
 - A high-quality architectural response replacing a predominantly hard car park;
 - Additional employment generation, including approximately 10 additional full-time and 12 part-time roles;
 - Compliance with sequential policy requirements through a robust Sequential Assessment; and
 - Environmental enhancements, including an Urban Greening Factor score of 0.33, exceeding the Mayor of London's recommended target of 0.3 for predominantly commercial development.
- 6.4 The application is supported by a comprehensive package of technical evidence which demonstrates that impacts relating to transport, flood risk, daylight/sunlight, noise, air quality, fire safety, arboriculture, ecology and airport safeguarding are acceptable or can be appropriately mitigated.
- 6.5 The principal matters requiring careful consideration relate to the relationship with Elm View House and the constrained landscaping offer. However, these matters have been materially improved through the reduction in scale, revised massing, increased separation distances and detailed design development. The landscaping strategy has also been optimised within the operational constraints of a functioning hotel environment.
- 6.6 When assessed in the round, any limited harm identified is considered modest and is clearly outweighed by the significant operational, economic and placemaking benefits arising from the proposal. The scheme accords with the Development Plan when read as a whole, together with the relevant provisions of the National Planning Policy Framework and London Plan. Planning permission should therefore be granted.

PLANNING CLARITY FOR COMPLEX PLACES.

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