

SEQUENTIAL TEST STATEMENT (HOTEL USE)

SITE ADDRESS: Heathrow Point West, 234 Bath Road, Heathrow, UB3 5AP
DATE: JANUARY 2026



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1. Introduction

- 1.1. Total Planning have been commissioned by Nine Group (the Applicant) to prepare and submit a Sequential Test to the London Borough of Hillingdon (the LPA) in support of a full planning application for:

“Erection of a new 4 storey hotel extension building with accommodation at roof and basement levels to provide 128 room with covered link bridge to existing hotel building associated with ancillary works.”

- 1.2. The proposal to regularise a large extension to the Novotel which is under construction. This application follows significant formal pre-application engagement with Hillingdon Council. It also follows commencement of planning permission ref: 41331/APP/2016/1035 for:

‘Erection of a 4 storey hotel existing building to accommodate 108 rooms with a covered link bridge to existing hotel building associated with ancillary works’.

- 1.3. The proposals relate to an extension to an existing hotel to which a similar extant approval was secured. Therefore, the principle of extending an existing hotel to provide additional traditional hotel rooms should be acceptable in principle and will generate business rate contributions for the borough and increase jobs and enhance the economy.

- 1.4. Policy E10 of the London Plan ‘Visitor Infrastructure’ states that a sufficient supply and range of serviced accommodation should be maintained. In outer London, serviced accommodation should be promoted in town centres and within opportunities areas where they are well connected by public transport, particularly to central London. The site is situated on Bath Road which is a major commercial road leading to Heathrow airport and tube/rail stations.

- 1.5. An Economic Statement prepared by Total Economics compiled a summary of the forecasted economic benefits of the scheme (further below in this statement). The public benefits are even more significant than the consented and extant hotel extension. This should weigh in favour of the enhanced proposals. This statement should be read in conjunction with this statement and the Planning, Design and Access Statement.

- 1.6. The Site is located at Heathrow Point West, 234 Bath Road, Heathrow UB3 5AP, within the Heathrow functional area and in a strongly established cluster of airport-related hotel and commercial uses along Bath Road.

- 1.7. This Sequential Assessment has been informed by national planning policy (NPPF), Planning Practice Guidance, the Hillingdon Local Plan, the London Plan (2021) and local market information, and considers whether there are any other sequentially preferable sites capable of accommodating the proposal.

2. Policy Background

- 2.1. The Site is located outside of a town centre, but is within the Heathrow Opportunity Area and benefits from a highly sustainable and accessible location appropriate for visitor infrastructure and airport-related demand.
- 2.2. The NPPF requires Local Planning Authorities to apply the sequential test to planning applications for main town centre uses (including hotels) which are neither in an existing centre nor in accordance with an up-to-date plan, directing such uses to town centres first, then edge-of-centre, and only then out-of-centre if suitable sites are not available.
- 2.3. Planning Practice Guidance confirms that the sequential approach should recognise that certain main town centre uses have particular market and locational requirements and that robust justification may be required where this is the case.
- 2.4. The London Plan (2021) Policy E10 (Visitor infrastructure) supports the provision of a sufficient supply and range of serviced accommodation and must be read alongside town centre policies (including the sequential approach within Policy SD7/SD8) for proposals outside designated centres.
- 2.5. The London Plan 2021, Policy E10 Visitor infrastructure outlines 'the importance of tourism to London's economy, London needs to ensure that it is able to meet the accommodation demands of tourists who want to visit the capital. It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average of 2,230 bedrooms per annum'.
- 2.6. The site is occupied by a former office building that has been converted to a hotel. Therefore, hotel use is firmly established on the site and it is the lawful use. Making more efficient use of existing hotel sites to deliver an increase in visitor infrastructure is expressly supported in planning policy terms.

3. Market Assessment

- 3.1. The local plan of Hillingdon (Part 1) suggests the following under its core policies for the economy.

'The GLA's Hotel Demand Study allocates a requirement of 3,800 new hotel rooms to the borough. However, Hillingdon's Tourism Study concludes that this figure underestimates long term future growth based on recent trends and suggests a need for 5,600 rooms by 2026. This estimated figure will be closely monitored, for example in light of any changes in operations at Heathrow or other significant developments. Hotel development in Hillingdon will help meet targets for both visitor accommodation and the Heathrow Opportunity Area employment growth target.'

- 3.2. The proposal relates to an established airport hotel location along Bath Road and is intended to serve the Heathrow Airport market, including overnight transit passengers, airline/airport-related visitors, and business demand associated with Heathrow.
- 3.3. It also relates to extension of an existing hotel site and making more efficient use of existing hotel locations is expressly supported in policy terms, but there is also a specific market for airport related hotel visitor accommodated needed at this location.
- 3.4. The Site has a stated PTAL of 4, indicating good public transport accessibility and supporting the sustainability credentials of additional hotel rooms in this location.
- 3.5. The principle of hotel use at Heathrow Point West has already been established through permissions including change of use to hotel (ref: 41331/APP/2015/1886) and subsequent hotel expansion permission (ref: 41331/APP/2016/1035). This application regularises and optimises an implemented development to deliver 236 rooms overall.
- 3.6. The proposal also delivers clear public benefits associated with visitor accommodation in the Heathrow Opportunity Area (employment generation, expenditure impacts, local fiscal benefits), as set out within the supporting PDAS and associated economic material.
- 3.7. An Economic Statement prepared by Total Economics compiled a summary of the forecasted economic benefits of the scheme which are below. The public benefits are even more significant than the consented and extant hotel extension. This should weigh in favour of the enhanced proposals (see below).

Temporary benefits during construction



£18 million
investment in construction
over two years



£9.6 million
gross value added
to London's economy



35 net additional
employment opportunities
directly or indirectly created
throughout London each year



10 jobs
created for residents of
hillingdon
based on current trends

Enduring benefits once complete and fully occupied



45 net additional
employment opportunities
directly or indirectly created
throughout London



9,000 visitors
accommodated each year
for multiple nights



£4.3 million
combined expenditure
on retail and leisure each year



15 jobs
supported by expenditure
of visitors



50 gross jobs
created on site
spanning a range of roles



£195,000
Council Tax and business rates
paid each year



£85,000 retained by the London Borough
of hillington

£65,000 payable to the
Greater London Authority

Total Economics summary of economic benefits of the scheme

4. Search criteria

4.1. Scope of Search

4.2. The Sequential Test scope has been defined having regard to the functional catchment of the development: an airport-related hotel serving Heathrow demand, where proximity and connectivity to the airport are central to viability and sustainability.

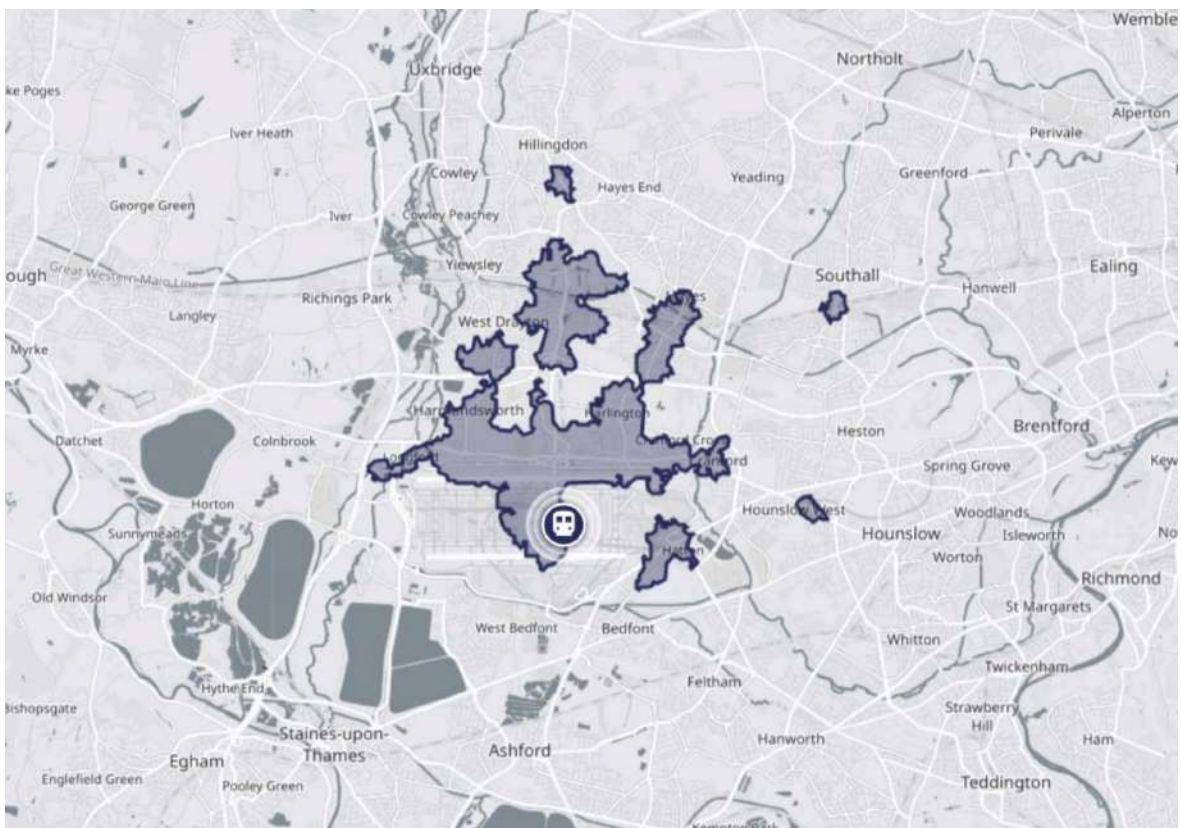
4.3. The NPPF defines town centres and confirms references apply to city, town, district and local centres identified in the development plan.

4.4. Consistent with the methodology for the sequential test for Axis House and planning application ref: 43794/APP/2021/3685 (allowed at appeal), the search area focuses on designated centres which are within a reasonable, sustainable travel time to Heathrow terminals, reflecting the operational requirements of an airport hotel. This methodology is set out below.

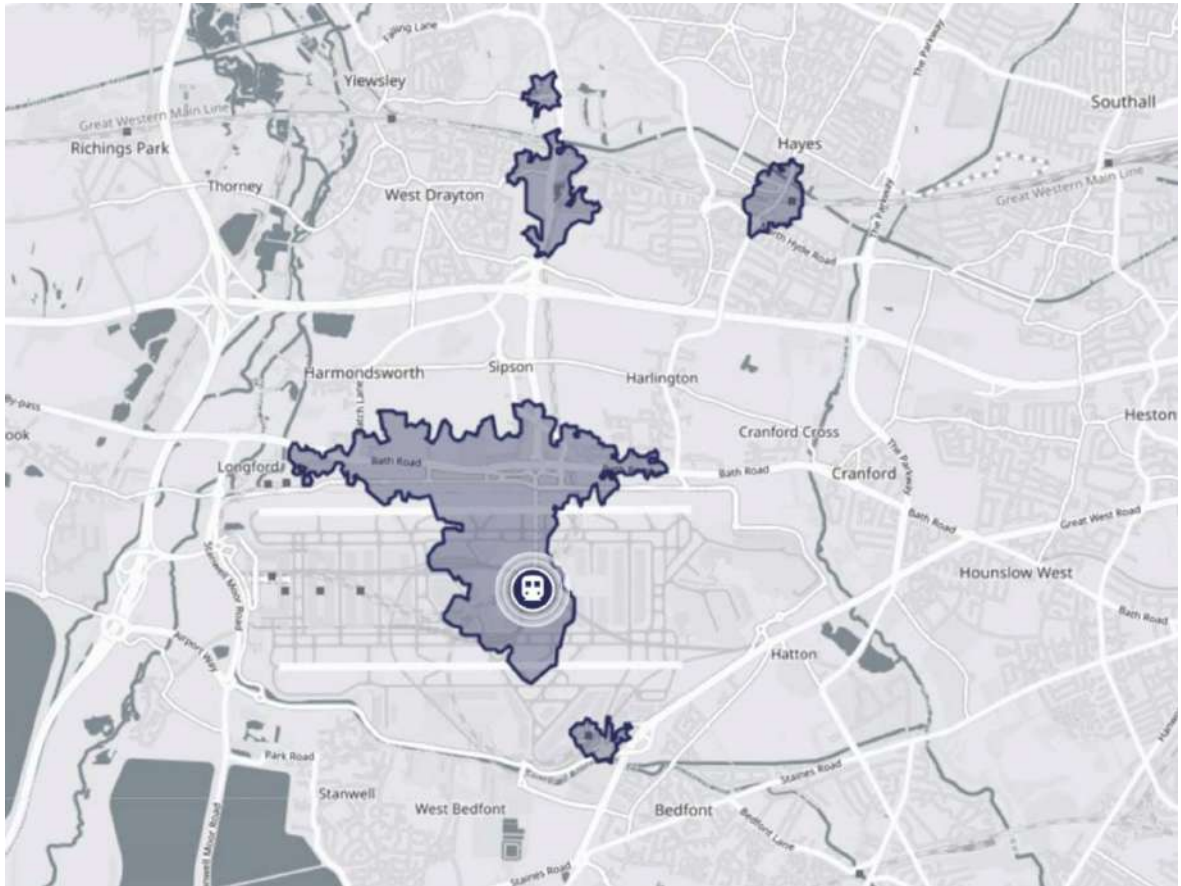
4.5. Travel time / sustainability parameters

4.6. The assessment applies an approximate 20-minute public transport travel time parameter from Heathrow as a reasonable and defensible proxy for a functional airport-hotel catchment, reflecting (i) the nature of demand, (ii) 24-hour operational patterns, and (iii) sustainability objectives.

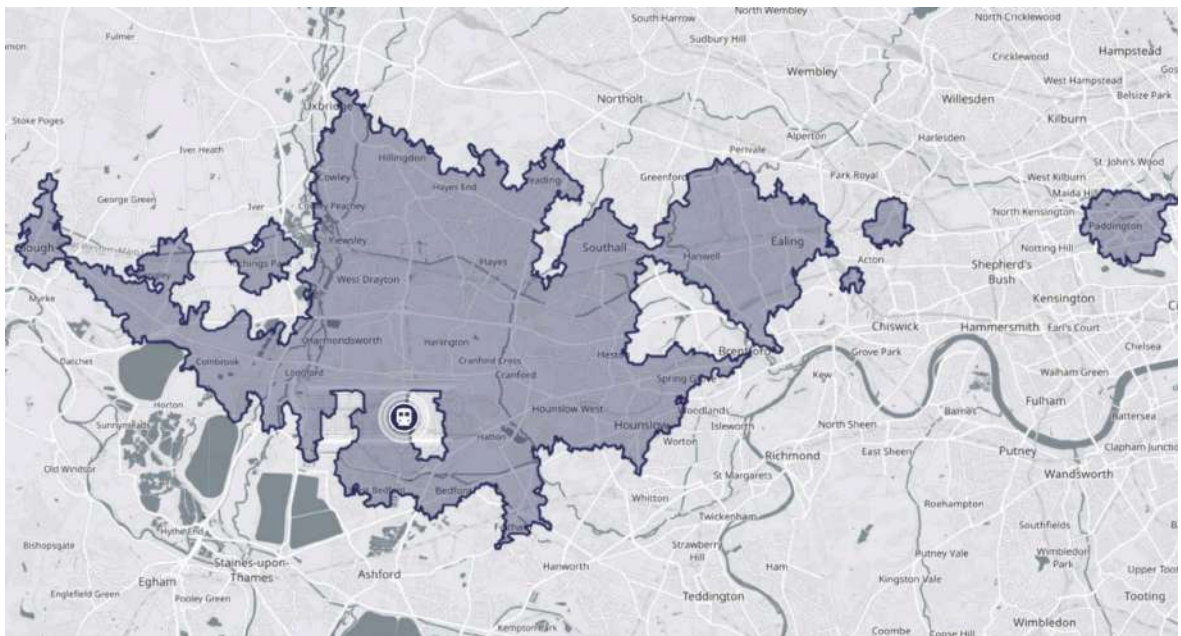
4.7. Beyond this threshold, locations become progressively less aligned with the airport market and increase reliance on longer journeys, undermining the functional rationale of an airport hotel.



Map outlining public transport within a 20-minute commuting time



Map outlining public transport within a 15-minute commuting time



Map outlining public transport within a 35-minute commuting time

- 4.8. The Hillingdon Local Plan considers a total of 5 district centres and 1 metropolitan centre of Uxbridge.
- 4.9. The five district centres are:

- Ruislip
- Hayes
- West Drayton
- Northwood
- Eastcote

4.10. The Hounslow Local Plan defines ten districts within the borough.

4.11. These are:

- Cranford & Heston
- Osterley & Spring Grove
- Brentford
- Chiswick
- Isleworth
- Hounslow
- Hounslow West
- Feltham
- Bedfont
- Hanworth

4.12. The Ealing Local Plan considers a total of 1 metropolitan centre (Ealing), 1 major centre (Southall) and 3 district centres (Greenford, Hanwell and Acton).

4.13. The NPPF considers tourism activities and developments such as hotels to be a town centre use. This search criteria takes into account the town centres which follows the requirements of the proposed hotel. This has been understood as a site which reflects sustainable travel to and from the Heathrow Airport and which ultimately serves the Airport location.

4.14. As such, the district towns of Hayes, Southall and West Drayton are considered suitable town centre locations for such a proposal due to their geographical location and presence within the 20-minute travel radius.

4.15. As previously mentioned, planning policy guidance goes to show both the 'Applicant and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored'.

4.16. When considering the geographical location of each site, the total travel time to the airport has been considered in line with the purpose of the hotel for tourism/transit use.

- 4.17. The search area for such a test has been argued in case law (*Regina v Braintree District Council Ex Parte Clacton Common Development Limited* 1998), it has been successfully argued that the scope of the sequential test should be limited to locations that may serve the intended catchment rather than all centres within the catchment (regardless of how wider “catchment” is defined).
- 4.18. In this instance it is considered the catchment to be Heathrow Airport and the surrounding towns within the London Borough of Hillingdon, Hounslow and Ealing. The importance of sustainability has been considered throughout the scheme and the incorporation of the use of public transport is evident. With this in mind, the travel map considers locations with an optimum amount of travel time (20 minutes) via public transport and as such the current site situates itself in an ideal location nearby the Heathrow airport.
- 4.19. The sites location in the context of serving the Heathrow airport market ultimately decides whether a site is indeed unviable or unsuitable within the airport hotel market.
- 4.20. This Sequential Test is undertaken recognising that:
- the proposal is not a new free-standing hotel but a physical extension to an existing hotel site, and therefore relocation is inherently constrained;
 - airport hotels have a clear “locational requirement” to be close to terminals and strategic transport infrastructure;
 - policy requires flexibility, but does not require an applicant to consider sites that would render the development operationally unworkable or fundamentally change the nature of the proposal (commonly reflected in appeal decisions and case law on sequential testing and flexibility).
- 4.21. The approach is also consistent with the principle that sequential scope should relate to the intended catchment and market served, rather than all centres within a wide administrative geography (as referenced in the Axis House statement application ref: 43794/APP/2021/3685).

6. Assessment

- 6.1. The assessment considers the above criteria to meet the sequential test.
- 6.2. The search has been informed by the same categories of evidence as Axis House (application ref: 43794/APP/2021/3685), namely:
 - local market context and the Heathrow hotel cluster;
 - review of centres within the defined catchment;
 - review of extant/implemented consents and site allocations where relevant; and
 - a practical assessment of availability and deliverability.
- 6.3. Each site is judged against:
 - Suitability – ability to accommodate a hotel development of this scale (up to 236 or rooms total) and serve the Heathrow market;
 - Availability – whether the site is on the open market / realistically capable of delivery;
 - Viability – whether the site could viably deliver airport hotel accommodation in a way that meets the functional requirements.
- 6.4. Importantly for Heathrow Point West, there is an additional sequential factor: the proposal is an extension that requires integration with the existing hotel (physical link bridge and unified operation). Sites that cannot enable this are not true alternatives.
- 6.5. Each site assessed in the sequential assessment has been judged against the following criteria.
- 6.6. Suitability - A site is considered suitable or unsuitable based upon the characteristics outlined above. The site in question must fit circa 159 hotel rooms with associated parking and access. The site must also be suitably positioned to serve transit visitors from Heathrow airport. A time of 20 minutes has been established as suitable for such a proposal.
- 6.7. Availability – A site is considered available if on the open market, whilst it is true that a site might be available off market this approach would provide too much uncertainty and therefore consist as an unreasonable requirement.
- 6.8. Viability – A proposal on any given site is considered viable if it meets the following attributes. It must a) Deliver through the planning system a hotel of circa 159 units b) Serve the Heathrow airport market.
- 6.9. The terms open and off market are defined as a site being openly available to the market and whether they have been actively for sale, for rent or otherwise. If not, the site is off market and is not considered available.
- 6.10. Please see Table 1 – Sequential Assessment of Identified Sites below for the full assessment.

6.11. Table 1 – Sequential Assessment of Identified Sites

Site No.	Town Centre	Site address (red edge as per original approach)	Suitable	Comment Justification	/ Available	Comment Justification	/ Viable	Comment Justification	/
1	Hayes	The Old Vinyl Factory, Blyth Road	Y	Potentially large enough, but would likely be part of wider mixed-use / residential-led scheme.	N	Committed consented residential-led development; not available for hotel of this nature.	–	Discounted due to lack of availability.	
2	Hayes	Goldmark House, Blyth Road	Y	Size could be theoretically capable.	N	Not on open market / committed to other uses.	–	Discounted.	
3	Hayes	Units 1–6 Vinyl Place / Dawley Road	N	Industrial context and constraints; not suitable for proposed airport hotel format/scale.	N	Not available in the manner required.	–	Discounted.	
4	Hayes	B1–4 Clayton Road	N	Environmental/amenity constraints for hotel format.	N	Not on open market.	–	Discounted.	
5	Hayes	Union House, 23 Clayton Road	Y	Physical capacity may exist.	N	Already converted/committed; not available.	–	Discounted.	
6	Hayes	Land NE of Nestles Avenue	N	Part of wider masterplan / residential-led focus; not suitable for Heathrow airport hotel need.	N	Not available.	–	Discounted.	
7	Hayes	Silverdale House, Pump Lane	N	Industrial designation context; unsuitable.	N	Unavailable.	–	Discounted.	
8	Hayes	Land SW side of Silverdale Road	N	Operational constraints (e.g. infrastructure use).	N	Not available.	–	Discounted.	
9	Hounslow West	8 Cavendish Parade, Bath Road	Y	Location could serve airport market.	N	Redevelopment pipeline; not available.	–	Discounted.	
10	Hounslow West	Hounslow West Underground Station, Bath Road	Y	Highly accessible.	N	Controlled ownership / not for sale.	–	Discounted.	
11	Hounslow West	314–320 Bath Road	Y	Suitable location.	N	Not on open market.	–	Discounted.	
12	Hounslow West	Land rear of Cavendish Parade	N	Site constraints limit hotel delivery.	N	Not available.	–	Discounted.	
13	Hounslow West	Pyramid House, 1 Martindale Road	N	Site constraints / configuration.	N	Not available.	–	Discounted.	
14	Southall	96 South Road	Y	Within catchment; could serve market in principle.	N	Committed redevelopment.	–	Discounted.	
15	Southall	Former Honda Garage, Merrick Road	Y	Within catchment.	N	Committed redevelopment.	–	Discounted.	
16	Southall	The Straight / Southall Gasworks Site	N	Mixed-use redevelopment already approved including hotel elements; not an available alternative.	N	Committed.	–	Discounted.	

17	Southall	Land at Merrick Road	Y	Scale could be possible in principle.	N	Committed residential-led development.	–	Discounted.
18	Southall	10 Park Avenue	Y	Within catchment.	N	Existing community use; not for sale.	–	Discounted.
19	Southall	The Green	Y	Within catchment.	N	Regeneration pipeline; not available.	–	Discounted.
20	Southall	Former Esso site, Merrick Road	Y	Within catchment.	N	Committed redevelopment.	–	Discounted.
21	Southall	West side of The Crescent	Y	Within catchment and potentially suitable.	N	Committed redevelopment.	–	Discounted.
22	West Drayton	4 Tavistock Road	N	Heritage / context constraints.	N	Not considered available due to unsuitability.	–	Discounted.
23	West Drayton	De Burgh Arms Hotel, High Street, Yiewsley	N	Listed/operational constraints; cannot accommodate required scale/format.	N	Not available as an alternative.	–	Discounted.
24	West Drayton	143–161 Odd High Street	N	Poor accessibility in relation to operational airport hotel requirements.	N	Not considered.	–	Discounted.
25	West Drayton	Land rear of Railway Arms PH, Station Road	N	Insufficient site size.	N	Not considered.	–	Discounted.
26	West Drayton	Trout Villa, Trout Road	N	Flood risk vulnerability concerns (and other constraints).	N	Not considered.	–	Discounted.
27	Heathrow	Heathrow Point West, 234 Bath Road (Application Site)	Y	Existing lawful hotel site; extension integrates with existing operation; optimal relationship to Heathrow demand.	Y	Controlled by applicant; deliverable and already implemented in part; application regularises development.	Y	Only site that delivers a unified 236-room airport hotel with direct integration to existing building.
28	Heathrow	Axis House, 242 Bath Road	N	Not an available alternative (committed to other use pipeline).	N	Not on open market.	–	Discounted.
29	Heathrow	London Heathrow Marriott, Bath Road	N	Existing hotel in operation; not available for redevelopment as alternative.	N	Not on open market.	–	Discounted.

6.12. Table outcome: all alternatives are discounted on suitability and/or availability and/or viability grounds; the Application Site is the only location that is suitable, available and viable and meets the operational requirement of an airport hotel extension delivering a unified 236-room offer.

7. Summary

- 7.1. The Sequential Test has considered centres and sites capable of serving Heathrow's airport hotel market, applying a functional catchment approach consistent with the Axis House methodology application ref: 43794/APP/2021/3685 (allowed at appeal).
- 7.2. The proposal is an extension to an existing hotel site with established lawful use and extant permissions, increasing hotel provision from 108 to 236 rooms to meet clear airport-related demand in a highly accessible location (PTAL 4).
- 7.3. There are **no sequentially preferable sites** within town centre or edge-of-centre locations that are **suitable, available and viable** to accommodate a hotel of this scale serving Heathrow, particularly given the defining characteristic that the development must function as an **integrated extension** (link bridge and unified operation) rather than a detached alternative.
- 7.4. In applying the sequential approach, the Applicant has demonstrated appropriate flexibility on form and scale (enhancing an approved extension), but it would be unreasonable and inconsistent with appeal practice to require the Applicant to pursue sites that would:
 - fail the functional test of an airport hotel (distance/connectivity);
 - undermine deliverability and operational coherence; or
 - fundamentally change the nature of the proposal (i.e., splitting an extension across remote sites).
- 7.5. When read alongside the PDAS evidence (including the established lawful hotel use, the implemented extant scheme, and the public benefits of intensifying visitor accommodation at Heathrow), the proposal satisfies the sequential approach and should be supported.

Appendix

The following shows the red edge of sites identified in the assessment.

Site 1



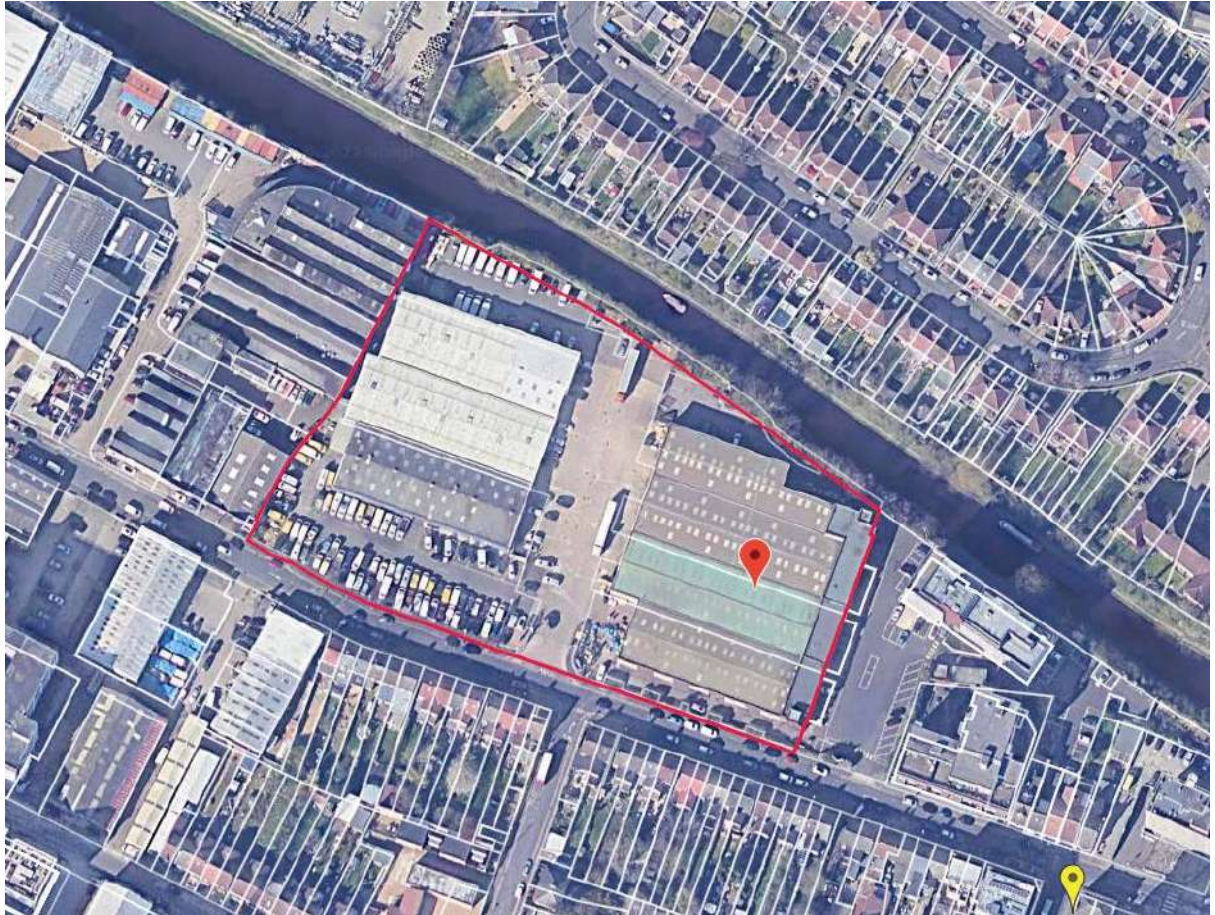
Site 2



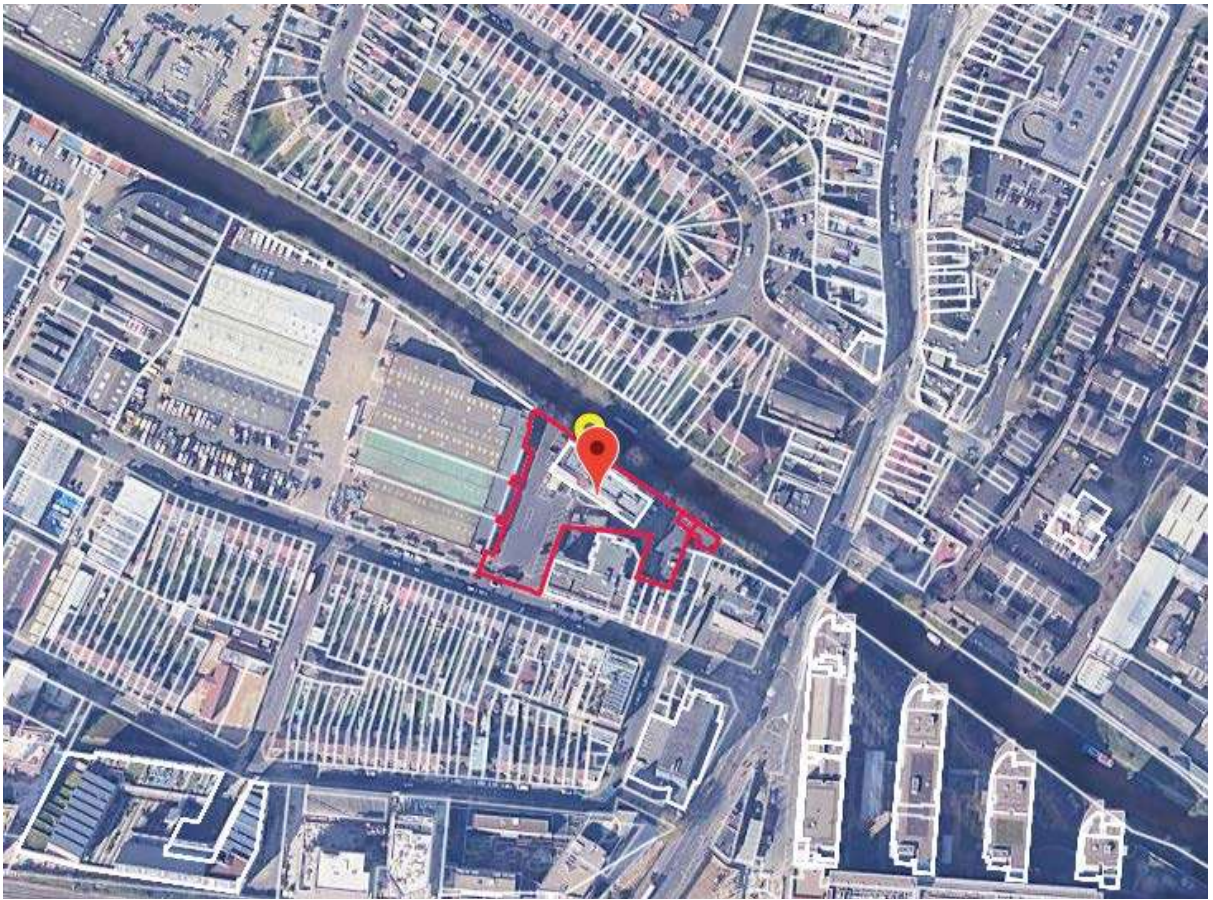
Site 3



Site 4



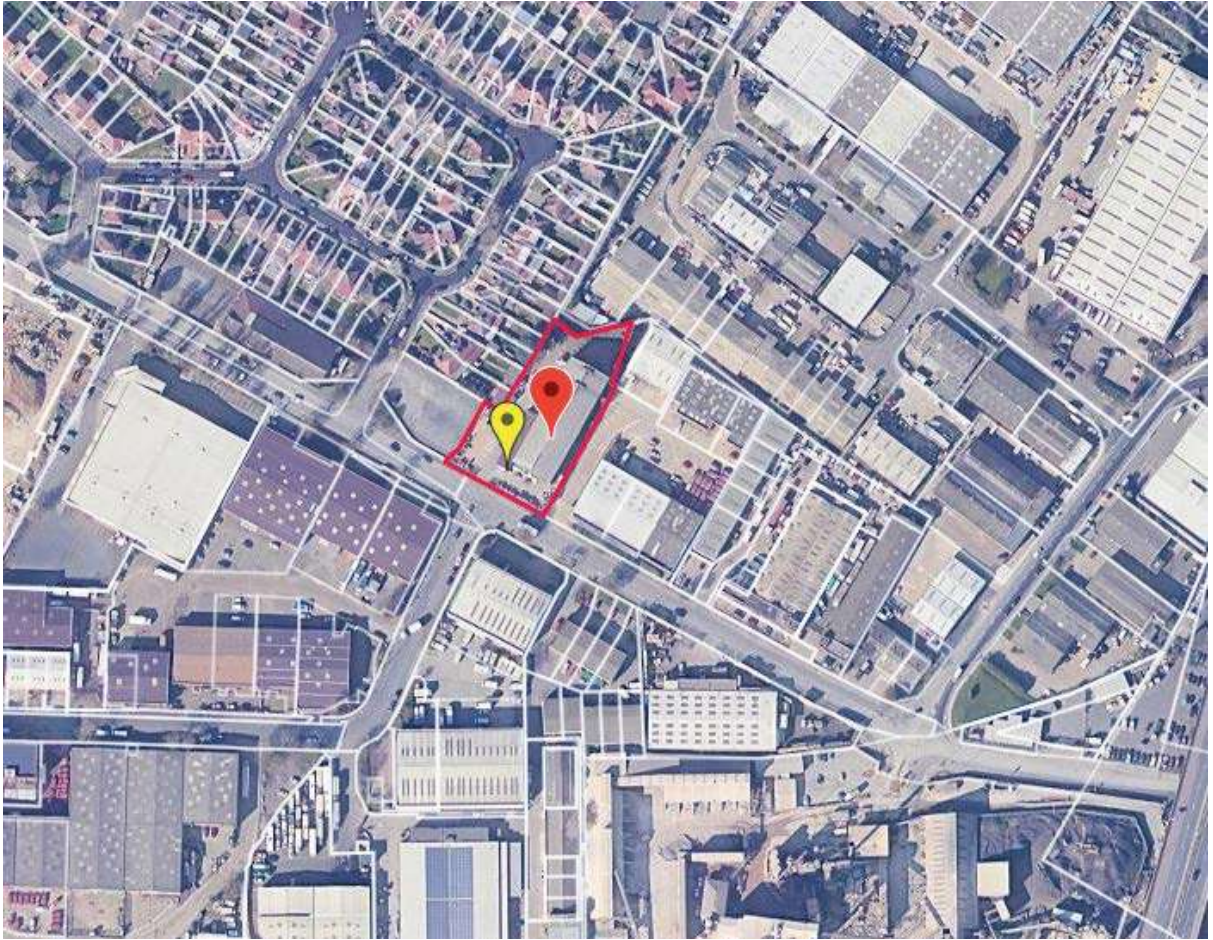
Site 5



Site 6



Site 7



Site 8



Site 9



Site 10



Site 11



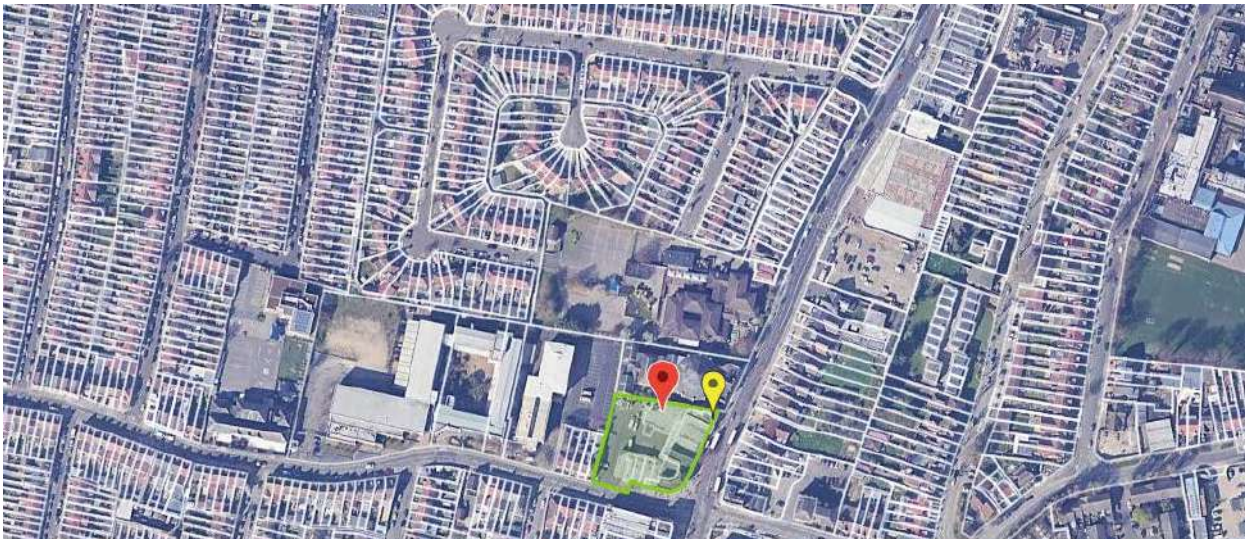
Site 12



Site 13



Site 14



Site 15



Site 16



Site 17



Site 18



Site 19



Site 20



Site 21



Site 22



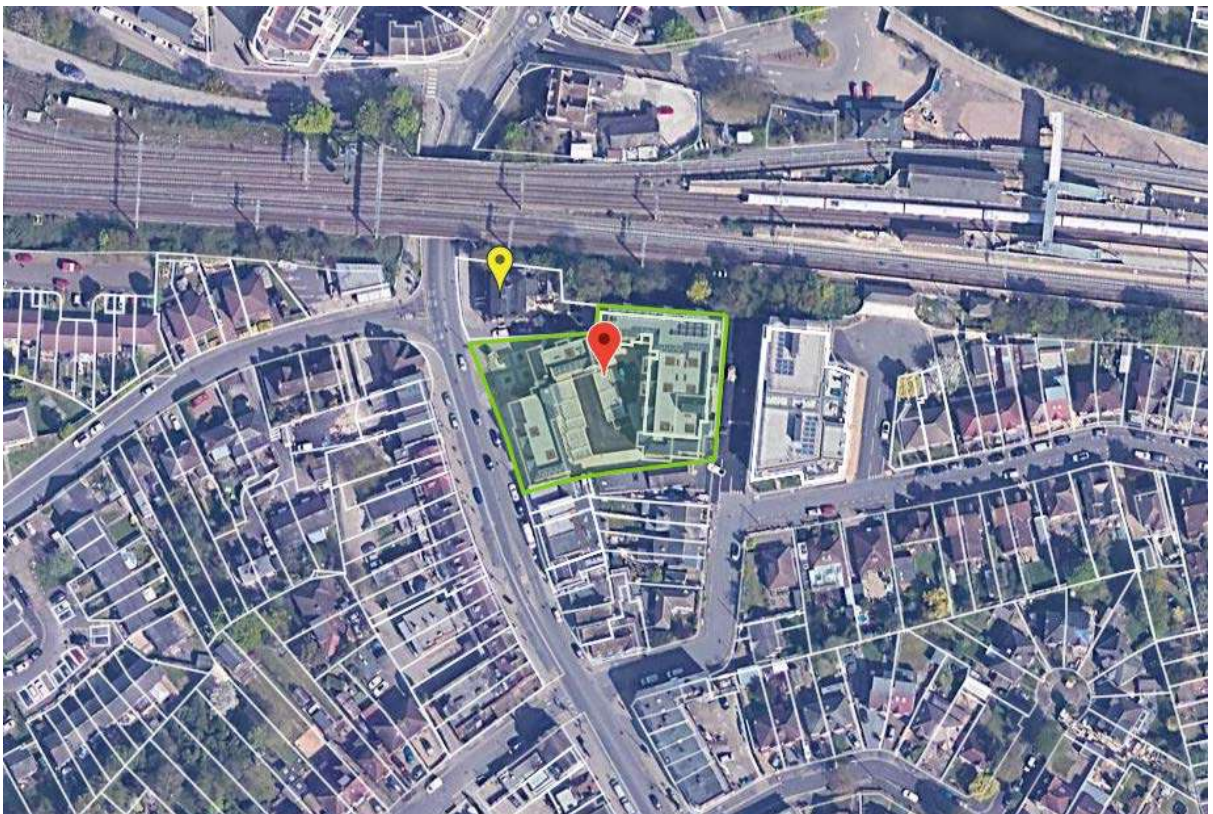
Site 23



Site 24



Site 25



Site 26



Site 27



Site 28



Site 29

