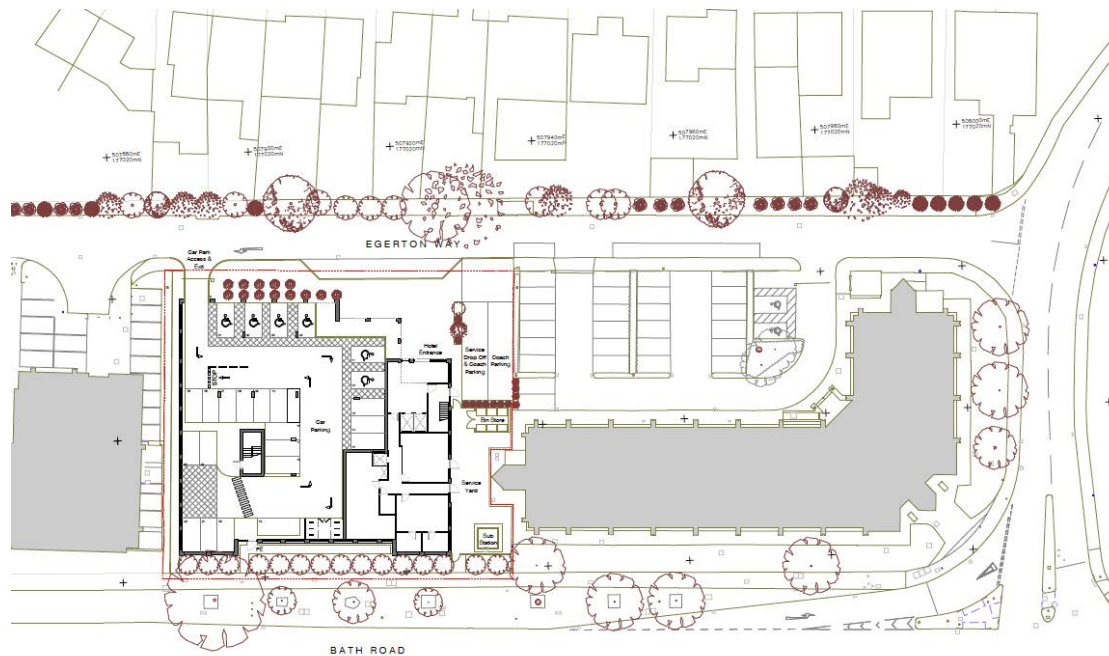


1. Introduction

- 1.1. Progress Planning have been commissioned by Acre Hotels Limited (The Applicant) to prepare and submit a Sequential Test to the London Borough of Hillingdon (The LPA) with an application for Full Planning Permission that seeks a 157-room hotel with associated access, car parking, hard standing and landscaping ("The Scheme"). The Site, Axis house, Bath Road currently consists of a hardstanding car park.
- 1.2. The scheme benefits from extant consent for a hotel, however this proposal seeks an additional storey and changes to the car parking arrangements and fenestration.
- 1.3. *Figure 1 – site outline*



- 1.4. This Sequential Assessment has been informed by National Planning Policy, Planning Practice Guidance, The Hillingdon Local Plan, The London Plan 2021 and local market information. This Statement considers whether there are any other sequentially preferable sites.

2. Policy Background

- 2.1. The site is located outside of a town centre, but is within the Heathrow Opportunity Area. The National Planning Policy Framework (NPPF) states the following:

'Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered' (paragraph 87).

'When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored' (paragraph 88).

- 2.2. 'The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). **It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking' (paragraph 9).**
- 2.3. Further information surrounding the locational use of a sequential test is given in the Planning Guidance for 'Assessing proposals for out of centre development', it notes that the 'use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification' (paragraph 12).
- 2.4. 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'.

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’.

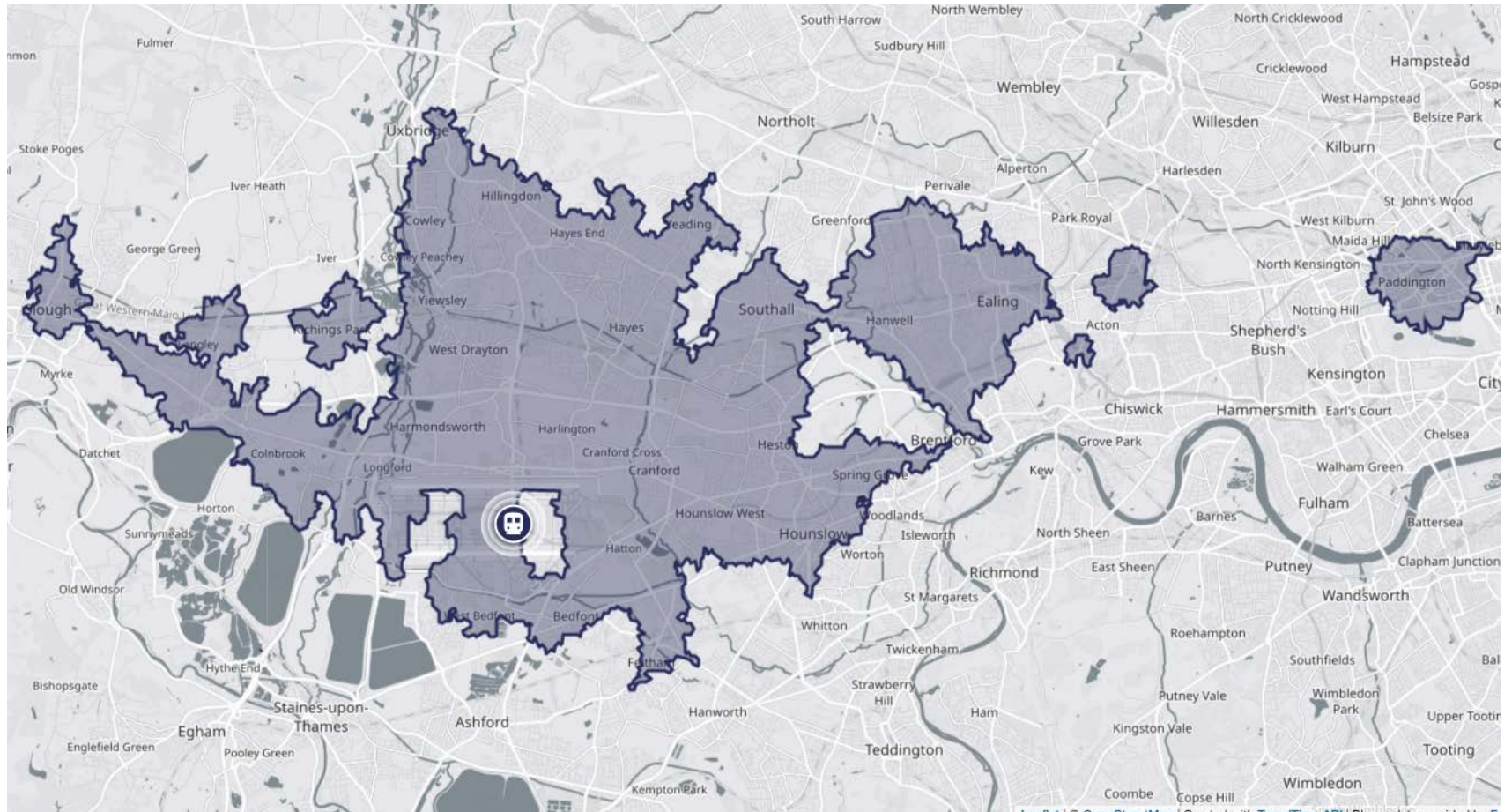
- 3.2. The intended criteria of the Hilton hotel will seek to cater to the Heathrow airport market and therefore looks to operate within or neighbouring the Heathrow Catchment Area. The application site consists of a PTAL rating of 4 (good) which contributes to the sustainable attitudes and logical positioning of such a site.
- 3.3. The need for more hotel rooms for the purpose of tourism has been justified in the Hillingdon Local Plan, the proposed hotel is considered to supply the borough with a further 157 hotel rooms and whilst the site falls outside of the town centre it is positioned in an area outlined for employment growth and therefore should be considered on these merits. In addition, this application only seeks to replace an existing extant permission on the site.
- 3.4. The site has been previously developed and used as a hardstanding car park for the purpose of Axis house adjacent. The plot size is substantial in size and has already gained extant consent for a similar hotel scheme. The market assessment goes to consider locations that will be suitable, available and viable for such a scheme.
- 3.5. The following section analyses sites that are available, suitable and viable for such a development in the London Borough of Hillingdon, Hounslow, Ealing and the local authority of Slough.

4. Search criteria

- 4.1. The following sets out the area of scope for the search of an alternative suitable site within a designated town centre. The designated town centres have been selected based upon their travel times to and from Heathrow.
- 4.2. The NPPF 2021 defines Town Centres as the ‘Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres’.
- 4.3. The search area considers sites of 20 minutes or less via public transport in line with the sustainable attributes NPPF. As there are various travel times for public transport across any given day, the site considers the mean of ‘20-minutes’. The purpose of this hotel is to serve the Heathrow airport market. Therefore, the closer the development is to the airport, the more sustainable the location. **A 20-minute travel time is considered reasonable given the need to reduce reliance on the private motor vehicle and encourage sustainable modes of transport. The travel time has informed the viability of the scheme, the greater the travel distance away from the Heathrow airport market the less functional and more unviable the use of the hotel becomes.**

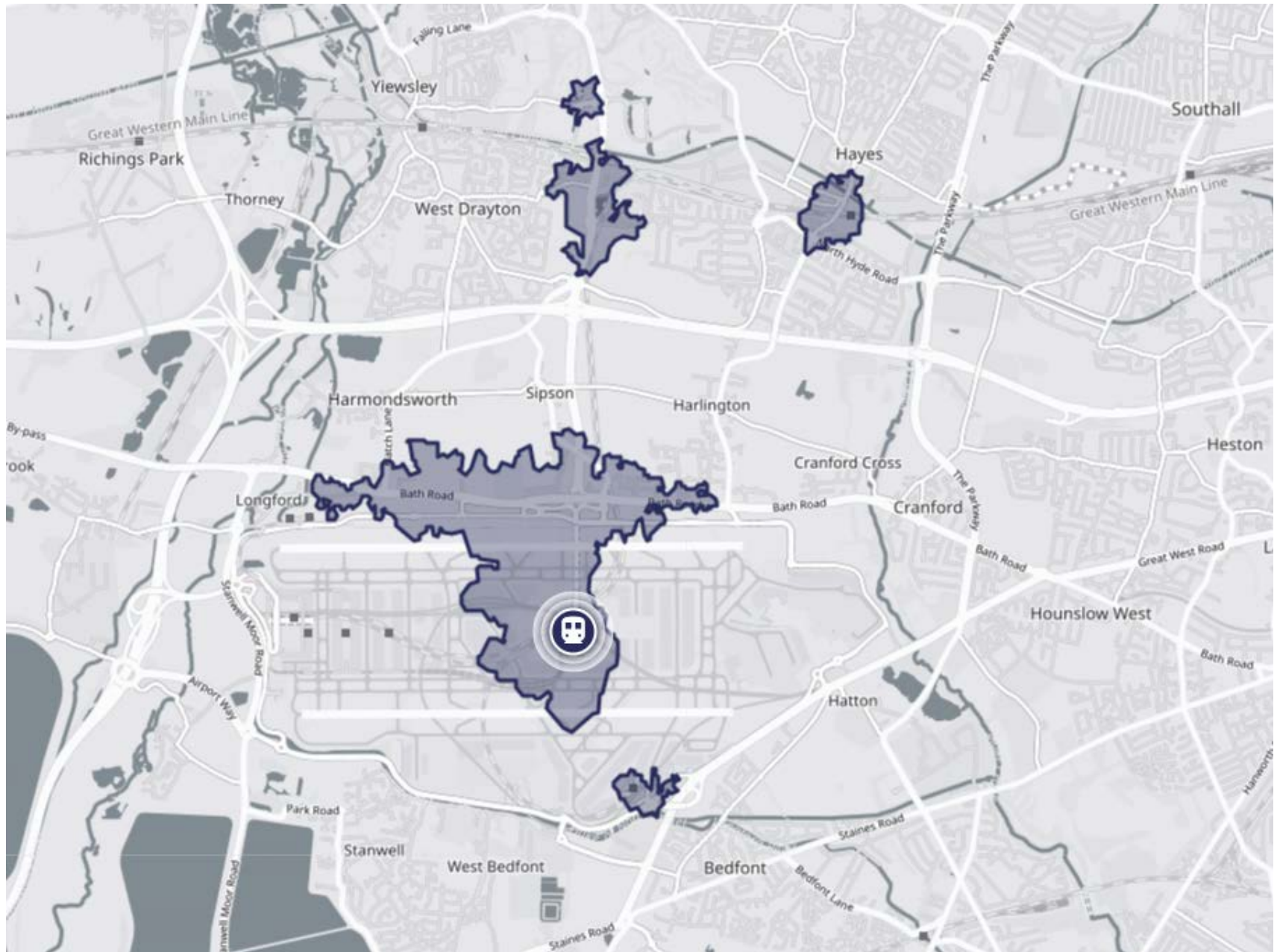
- 4.4. The source of the location is Heathrow Airport terminal 2 and 3 Train Station. The travel times have been provided using a data source from TravelTime.com, this is considered an accurate way of analysing and providing an average of a set journey time across the day.
- 4.5. Map outlining public transport within a 20-minute commuting time.

4.7. Map outlining public transport within a 35-minute commuting time.



4.8.

4.9. Map outlining public transport within a 15-minute commuting time.



- 4.11. Only sites identified within the 20-minute public transport radius will be considered. Fundamentally, it is clear that the 20-minute radius largely considers the areas of South Hillingdon, Southall and Cranford/ Hatton in Hounslow. The applicant considers locations outside of this 20-minute commuting distance to be unavailable for the type of hotel market they are providing for. For example, the areas of Feltham, Staines, Slough and Ealing would be unsuitable as they do not fit the criteria for a hotel serving the Heathrow airport market. To confirm the criteria is a 20-minute public transport journey which takes into account the average of travel across a 24-hour period.
- 4.12. The Hillingdon Local Plan considers a total of 5 district centres and 1 metropolitan centre of Uxbridge.
- 4.13. The five district centres are:
- Ruislip
 - Hayes
 - West Drayton
 - Northwood
 - Eastcote
- 4.14. The Hounslow Local Plan defines ten districts within the borough.
- 4.15. These are:
- Cranford & Heston
 - Osterley & Spring Grove
 - Brentford
 - Chiswick
 - Isleworth
 - Hounslow
 - Hounslow West
 - Feltham
 - Bedfont
 - Hanworth
- 4.16. The Ealing Local Plan considers a total of 1 metropolitan centre (Ealing), 1 major centre (Southall) and 3 district centres (Greenford, Hanwell and Acton).

- 4.17. 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.
- 4.18. 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.
- 4.19. 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'.
- 4.20. 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.
- 4.21. 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).
- 4.22. 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.
- 4.23. 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.

Site size and area character

- 4.24. The site is 0.20 hectares, and the proposal includes a total of 23 car parking spaces for staff and occupiers. Additional space is given over to a taxi rank, landscaping, associated access as well as cycle and refuge storage, overall, the scheme will provide a similar number of rooms to the extant consent with a total of 159 rooms.
- 4.25. This proposal differs from the previous scheme in that it is an additional storey, however, the ground floor level will now be partly utilised by parking and as such there are a similar number of hotel floors.

Availability and viability of sites

- 4.26. The availability of different sites across the borough are limited given the nature of the London commercial market, nonetheless the applicant has instructed Progress Planning to give a full assessment of the wider market surrounding Heathrow Airport.

5. **Assessment**

- 5.1. The assessment considers the above in order to meet the sequential test.
- 5.2. The search for sites has been conducted using the following information. The local market analysis, a search of extant or implemented consents in the town centres of Hayes, Southall and West Drayton which identifies a pipeline for hotels to come forward in the future. Note that the existing site has an extant consent for a similar sized hotel.
- 5.3. Emphasise will be made on sites with put onto previously approved sites which provide new hotels in a suitable area. However, councils often do not include hotels in their allocations, so this aspect does not carry as much weight. The documents used to help identify land use will be the Hillingdon Local Plan Part 2 January 2020, Ealing's development sites and Hounslow local plan volume 2 which identifies site allocations.
- 5.4. The proposal continues to monitor emerging information and documents from Hillingdon, Ealing and Hounslow Council such as the most up to date site allocations and emerging applications.
- 5.5. Each site assessed in the sequential assessment has been judged against the following criteria.
- 5.6. 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.
- 5.7. 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.
- 5.8. Viability – A proposal on any given site is consider 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.
- 5.9. 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.

- 5.10. The below table (Table 1) identifies sites which are considered suitable and available, the viability of these sites will be considered.

Site number	Town Centre	Site address for red edge (see appendix)	Suitable	Comment/ Justification	Available	Comment/ Justification	Viable	Comment/ Justification
1	Hayes	The Old Vinyl Factory, Blyth Road	Y	The site is too large to facilitate just a hotel redevelopment, however it is suitable should part of the site come forward.	N	The site has approved planning for 134 dwellings and the wider site has outlined 510 dwellings. No hotel is incorporated into the site.	-	On balance, given the consent obtained a viability assessment would be fruitless. The site is therefore discounted from the assessment.
2	Hayes	Goldmark House, Blyth Road	Y	The site is a suitable size and would provide an effective route to Heathrow airport.	N	Application for 120 dwellings, the site while considered suitable, the site is not on the open market and is unavailable as such is considered an unviable option.	-	The site is therefore discounted from the assessment.
3	Hayes	Units 1-6, Vinyl Place, Land And Buildings On The East Side Of Dawley Road, Hayes, UB3 1DA	N	The sites lies within the industrial centre of Hayes and is therefore	N	The site has an application for 81 dwellings and is therefore not currently available for redevelopment	-	The site is not suitable not available and therefore it discounted from the assessment. No viability has been undertaken due to the factors outlined.

				considered unsuitable,		in the manner sought.		
4	Hayes	B1 to 4 Clayton Road Hayes UB3 1AN	N	Unsuitable for a development that is sought given the noise concerns surrounding the area.	N	The site is not on the open market.	-	The site is not suitable not available and therefore it discounted from the assessment. No viability has been undertaken due to the factors outlined.
5	Hayes	Union House 23 Clayton Road Hayes UB3 1AA	Y	The site would be suitable.	N	The site has already been converted to C3 from class E.	-	The site is not available and therefore it discounted from the assessment.
6	Hayes	Land On The North-East Side Of Nestles Avenue Hayes UB3 4FS	N	Nestles Avenue forms part of a wider masterplan to increase the residential led development within Hayes. It is therefore unsuitable and unavailable when considering whether it could cater the Heathrow airport market.	N	Nestles Avenue forms part of a wider masterplan to increase the residential led development within Hayes. It is therefore unsuitable and unable.	-	The site is not suitable nor available and therefore it discounted from the assessment.

7	Hayes	Silverdale House Pump Lane Hayes UB3 3NB	N	The site is designated as an industrial zone and therefore unsuitable for a hotel proposal.	N	The site is designated as an industrial zone and therefore unsuitable for a hotel proposal.	-	The site has been discounted from the assessment.
8	Hayes	Land And Buildings On The South West Side Of Silverdale Road UB3 3BN	N	This site is used as an electrical station and owned by Tameside Borough Council and is therefore unsuitable.	N	This site is used as an electrical station and owned by Tameside Borough Council and is therefore unavailable.	-	The site has been discounted from the assessment.
9	Hounslow West	8 Cavendish Parade Bath Road Hounslow Tw4 7dj	Y	The site would provide straightforward access to the airport within the required criteria.	N	The site is being redeveloped to accommodate 176 new units.	-	The site has been discounted from the assessment due to its lack of availability.
10	Hounslow West	Hounslow West Underground Station, Bath Road, Hounslow TW3 3DH	Y	The site is owned by TFL and is not for sale.	N	The site is owned by TFL and is not for sale.	-	The site is not suitable not available and therefore it discounted from the assessment. No viability has been undertaken due to the factors outlined.

11	Hounslow West	314-320 Bath Road, Hounslow TW4 7HW	Y	The location would provide relative ease to the airport.	N	The site is suitable and is not available on the open market.	-	The site has been discounted from the assessment.
12	Hounslow West	Land To The Rear Of Cavendish Parade Bath Road Hounslow Tw4 7dj	N	The site would not accommodate a hotel in this location.	N	The site is being redeveloped.	-	The site has been discounted from the assessment due to its lack of availability.
13	Hounslow West	Pyramid House 1 Martindale Road Hounslow Tw4 7ew	N	The site would not accommodate a hotel in this location due to site constraints.	N	The site is not suitable and is not available on the open market.	-	The site is unsuitable for a hotel in this location. It has been discounted from the assessment due to its lack of availability.
14	Southall	96 South Road Southall Middlesex UB1 1RB	Y	The location is suitable in terms of time distance via public transport to and from the Heathrow airport market.	N	The site is being redeveloped to contain 41 residential units.	-	The site has been discounted from the assessment due to its lack of availability. No viability has been undertaken due to the factors outlined.
15	Southall	Former Honda Garage 1-23 Merrick Road Southall Middlesex UB2 4AG	Y	The location is suitable in terms of time distance via public transport to and from the	N	The site is being redeveloped to accommodate 170 dwellings.	-	The site has been discounted from the assessment and as such no viability has been undertaken due to the factors outlined.

				Heathrow airport market.				
16	Southall	The Straight, Southall Gasworks Site Hayes By Pass Hayes Ub1 1qx	N	The site has planning permission for its redevelopment, it will contain a hotel and a number of other services. It also sits on the very edge of the 20-minute commuting time limit.	N	The site has planning permission for its redevelopment	-	The site has been discounted from the assessment.
17	Southall	Land At Merrick Road Southall UB2 4AU	Y	Part of the site would be suitable for a hotel scheme.	N	The land currently has planning permission for circa 575 dwellings. It is therefore considered unavailable for redevelopment in the manner proposed.	-	The site has been discounted from the assessment.
18	Southall	10 Park Avenue, Ealing, Southall, UB1 3AQ	Y	The site is located adjacent to the railway and within a reasonable	N	The site is currently used as a Gurdwara and is not for sale.	-	The site has been discounted from the assessment due to the site being used as a

				time distance to the airport.				Gurdwara and is not for sale.
19	Southall	The Green, Southall UB2 4QH	Y	The site is located close to the railway and within a reasonable time distance to the airport.	N	Large scale redevelopment of the area to incorporate a 20 new residential led development	-	The site is already being redeveloped and as such is not available.
20	Southall	Former Esso Petrol Filling Station Site Merrick Road Southall UB2 4AU	Y	The site is located close to the railway and within a reasonable time distance to the airport.	N	A suitable size and positioning, the site is currently being redeveloped to accommodate 166 dwellings.	-	The site has been discounted from the assessment.
21	Southall	Land On The West Side Of The Crescent, Southall UB1 1BE, UB1 1BL	Y	The site is located close to the railway and within a reasonable time distance to the airport. The size of the site is considered suitable.	N	The site is currently being redeveloped to provide a number of dwellings.	-	The site has been discounted from the assessment.
22	West Drayton	4 Tavistock Road Hillingdon West Drayton UB7 7QT	N	The site is unsuitable as it is opposite a listed building. An application	N	The site is unsuitable and therefor its availability is	-	The site has been discounted from the assessment.

				similar to the proposed would have an impact on the significance of the building.		not considered.		
23	West Drayton	De Burgh Arms Hotel High Street Yiewsley West Drayton UB7 7DQ	N	The site is a listed building and whilst currently used as a hotel would not accommodate the required numbers to make a Hilton Hotel viable.	N	The site is a listed building and whilst currently used as a hotel would not accommodate the required numbers to make a Hilton Hotel viable.	-	The site is a listed building and whilst currently used as a hotel would not accommodate the required numbers to make a Hilton Hotel viable. The site has been discounted from the assessment.
24	West Drayton	143 To 161 Odd High Street Yiewsley UB7 7QH	N	The site located some distance from a nearby efficient public transport and is therefore considered unsuitable.	N	The site is unsuitable and therefor its availability is not considered.	-	The site located some distance from a nearby efficient public transport. It is therefore discounted.
25	West Drayton	Land At The Rear Of The Railway Arms Public House Station Road West Drayton UB7 7BT	N	The site would not accommodate the proposal due to the size of the land.	N	The site is unsuitable and therefor its availability is not considered.	-	It is therefore discounted.

26	West Drayton	Trout Villa, Trout Road, Hillingdon, West Drayton, UB7 7RT	N	The site is vulnerable to flooding for future occupiers.	N	The site is vulnerable to flooding for future occupiers and as such is availability is not considered.	-	The site is discounted from the assessment.
27	Heathrow	Heathrow Point West 234 Bath Road Heathrow UB3 5AP	N	The site received planning for a change of use office to hotel in 2015.	N	The site received planning for a change of use office to hotel in 2015. The site has been converted.	-	The site is discounted from the assessment.
28	Heathrow	Axis House 242 Bath Road Sipson	N	A change of use from office to 64 dwellings has been approved and in affect.	N	A change of use from office to 64 dwellings has been approved and in affect.	-	The site is discounted from the assessment.
29	Heathrow	London Heathrow Marriott Hotel Bath Road Heathrow UB3 5AN	N	No as the site is used as a hotel.	N	The site is not found on the open market and is therefore not considered for sale.	-	Current application for a part 5 and part 6 storey extension to an existing hotel. The site is discounted from the assessment.

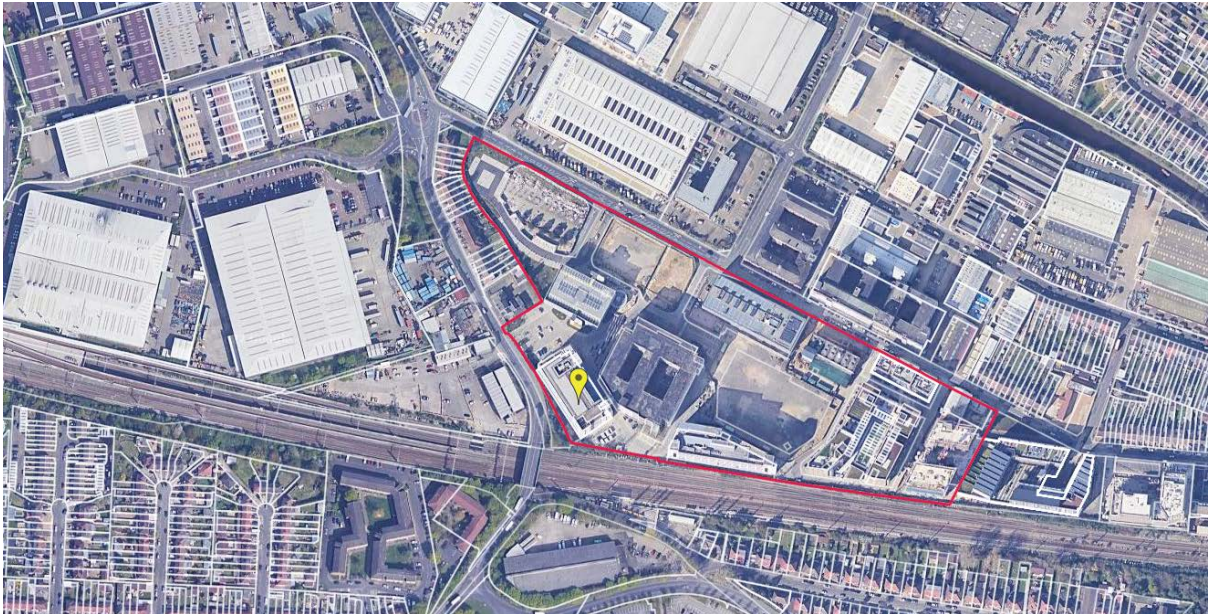
6. Summary

- 6.1. The assessment considered the London Boroughs of Hounslow, Ealing and Hillingdon as these were considered to have an effective reach to Heathrow for future users of the hotel. The following aspects of location in the context of Heathrow Airport, size of the site and requirements this proposal were all considered for the sequential test.
- 6.2. The NPPF considers tourism developments such as hotels to be a town centre and outer town centre use. Beyond this a sequential test is required to justify the decision of a site outside this location. However, it is argued that Heathrow Airport, considering its scale, use and nature requires hotel capacity on its doorstep which would be sustainably located and accessible.
- 6.3. Nevertheless, this assessment provides a search of the closest town centres for a site that could deliver the requirements of the proposed hotel and is sustainably located to Heathrow Airport. The assessment also considers whether there is an appropriate pipeline of future hotel developments within the search area. In line with the London Plan 2021 there is a requirement of 2,230 bedrooms per annum. It is considered there is not currently a strong enough supply of hotels in the Heathrow catchment.
- 6.4. The Sequential Test considers the boroughs which maintained an effective reach for future users of the site. Of the sites and towns considered, it is considered that this development would pass the sequential test and there are no sequentially preferable sites. The application site also has an extant consent for a similar sized hotel and this proposal only seeks to replace this consent with a more viable proposition.

Appendix

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

Site 1



Site 2



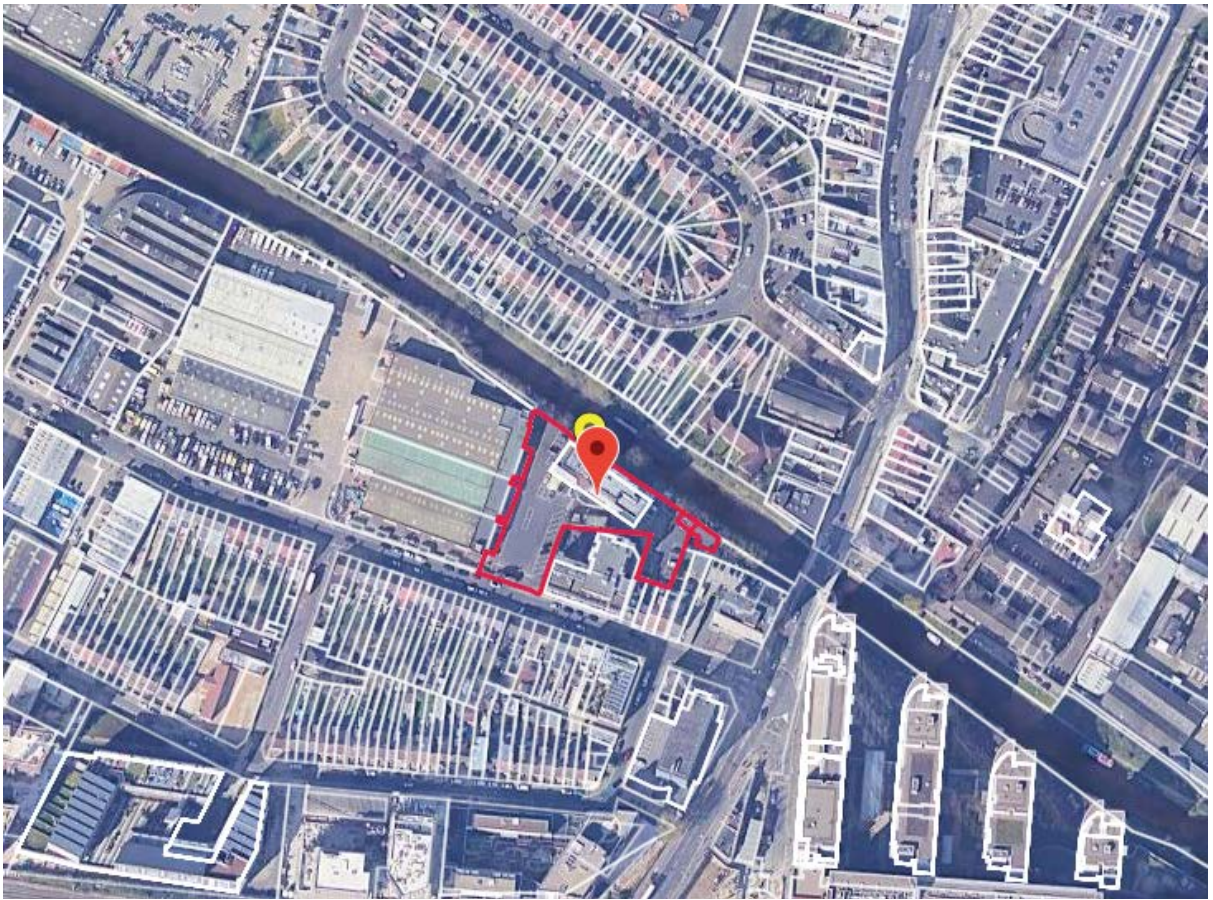
Site 3



Site 4



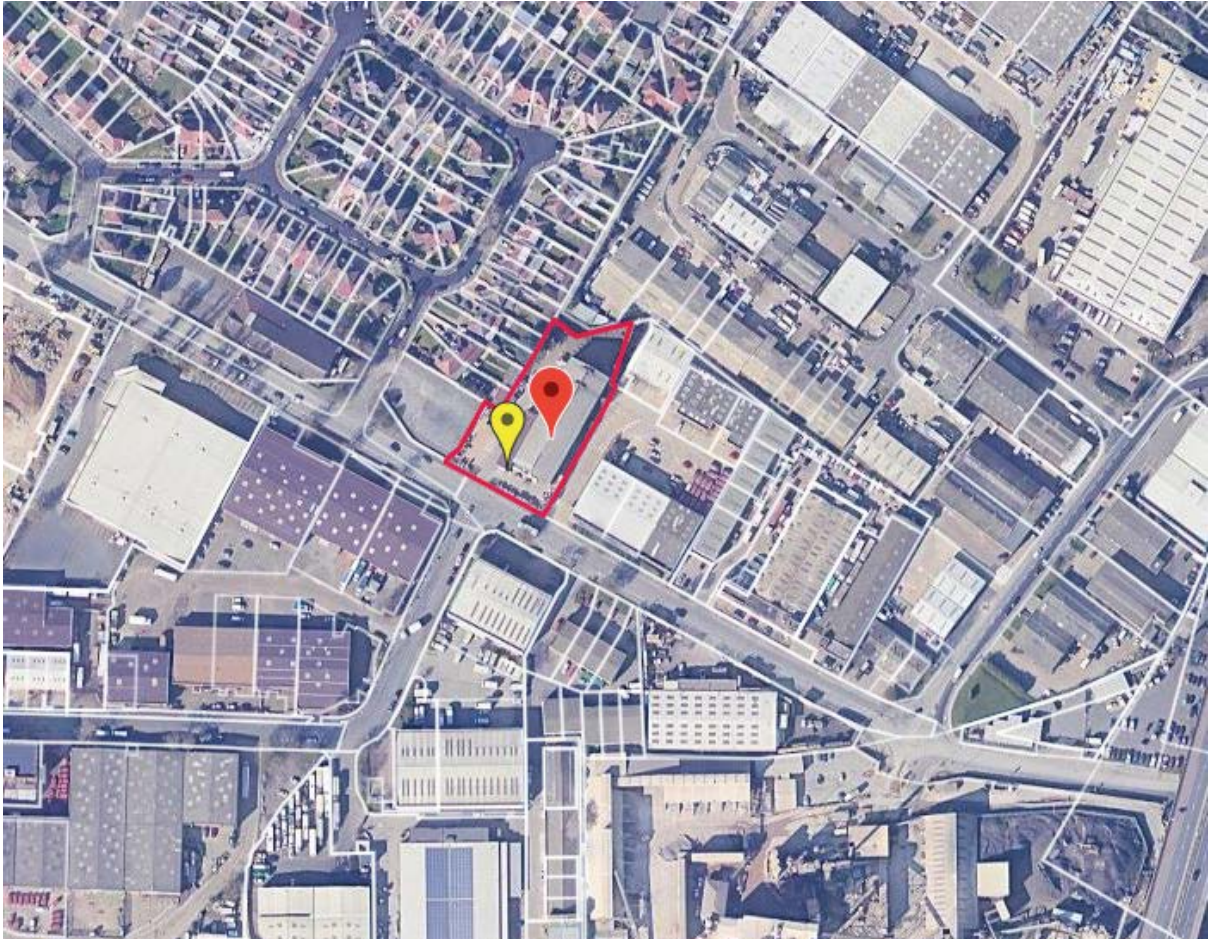
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Site 6



Site 7



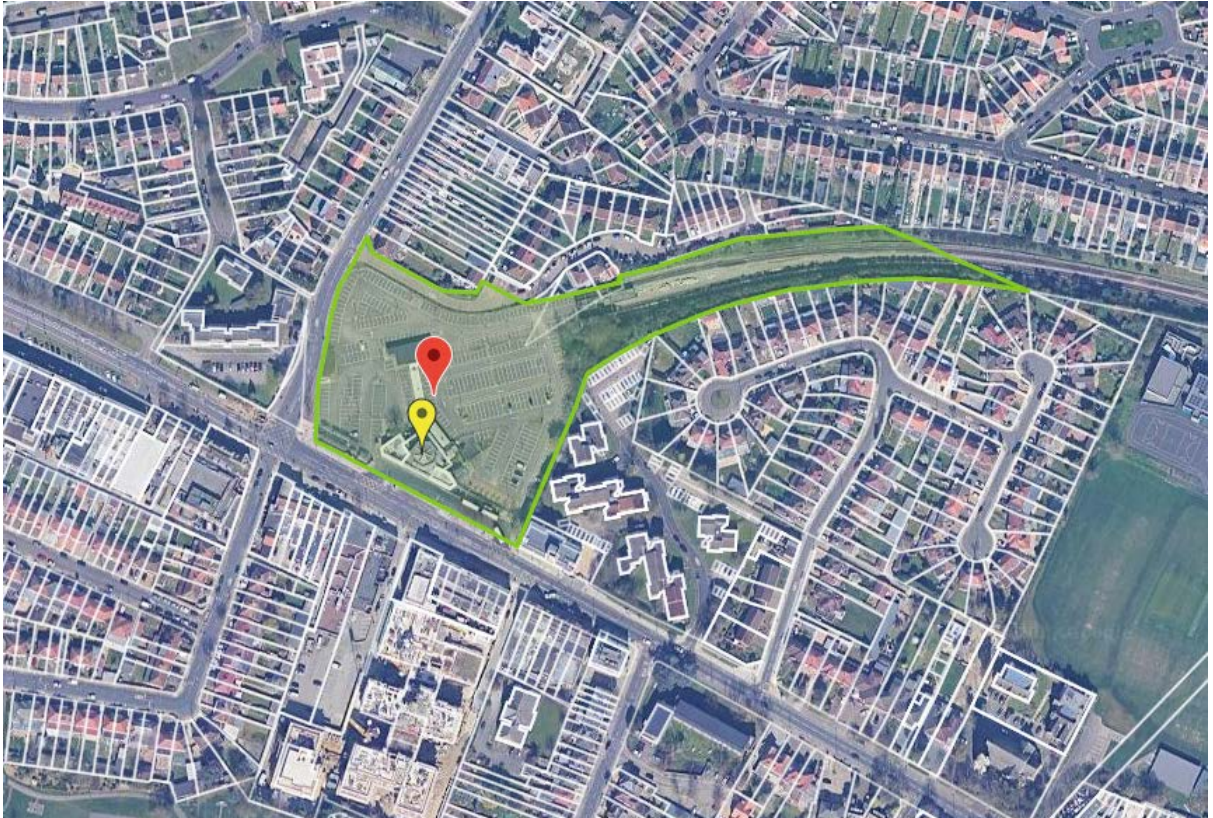
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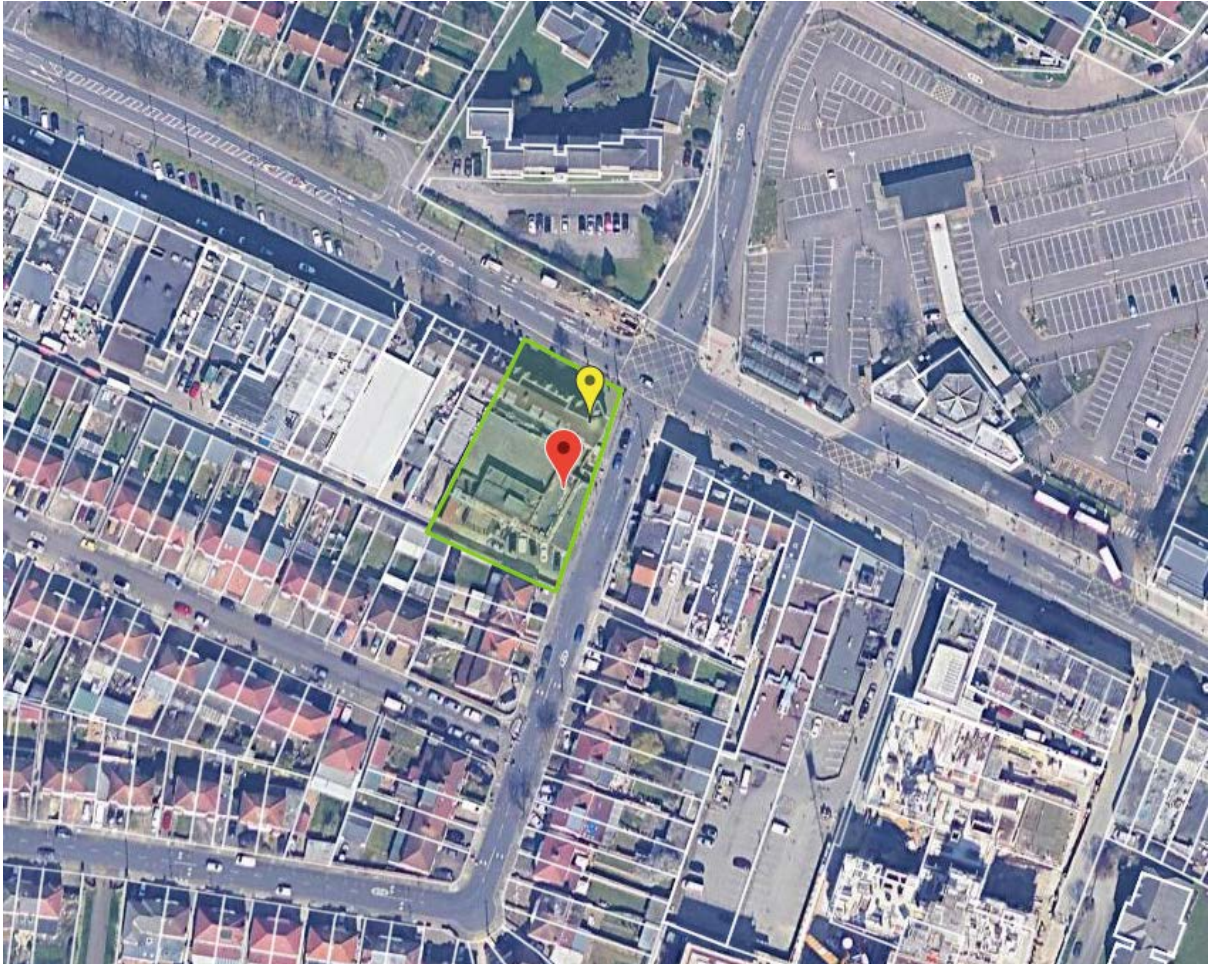
Site 9



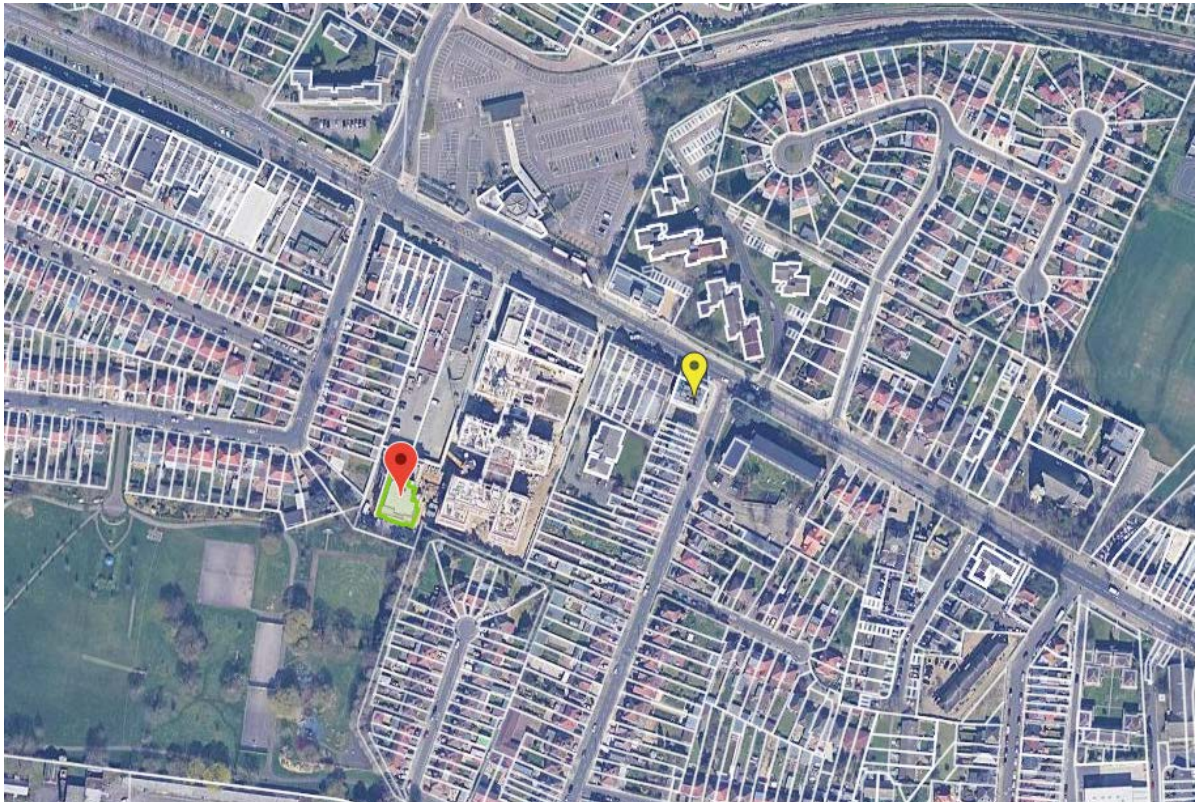
Site 10



Site 11



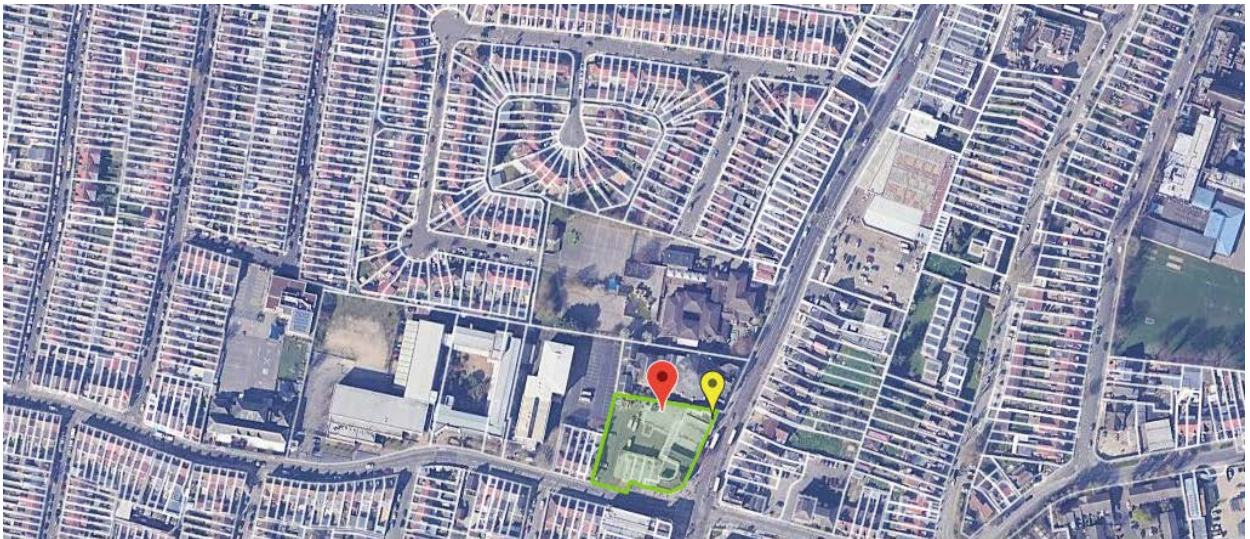
Site 12



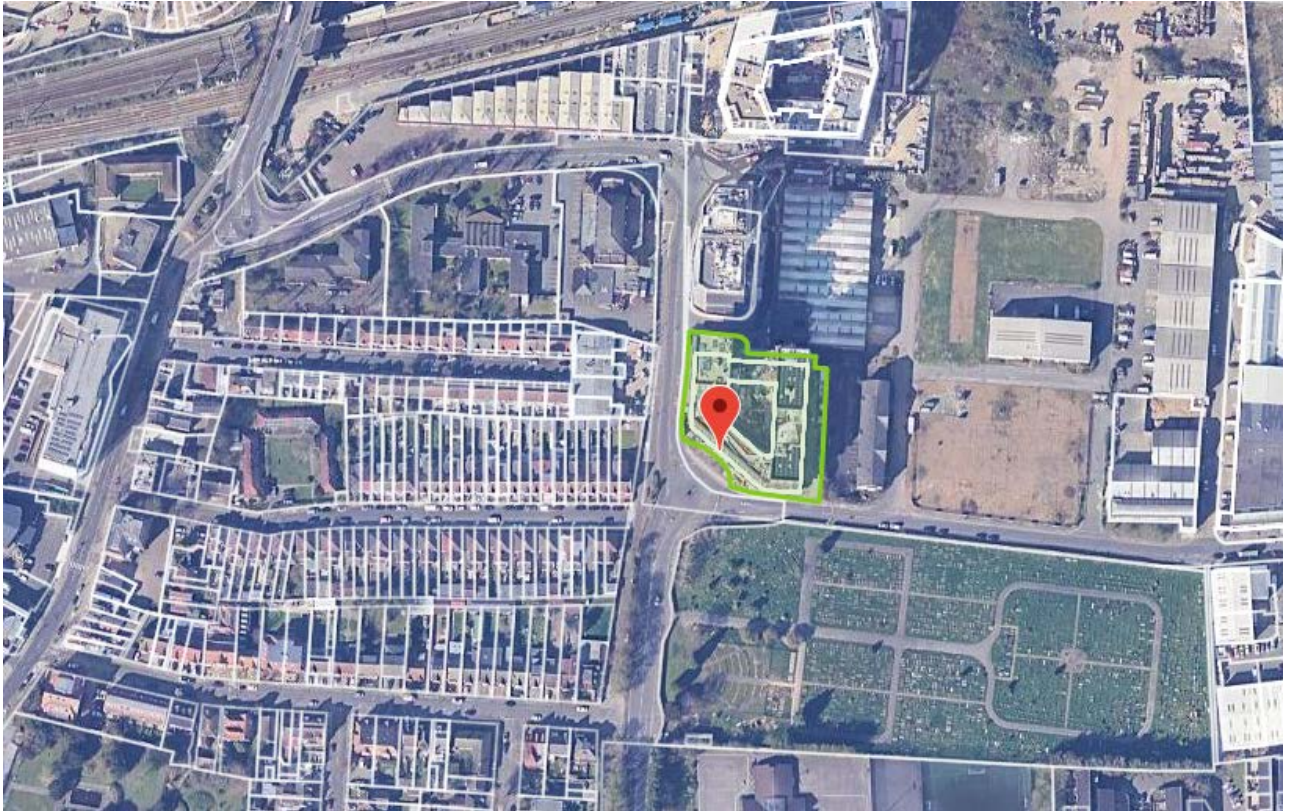
Site 13



Site 14



Site 15



Site 16



Site 17



Site 18



Site 19



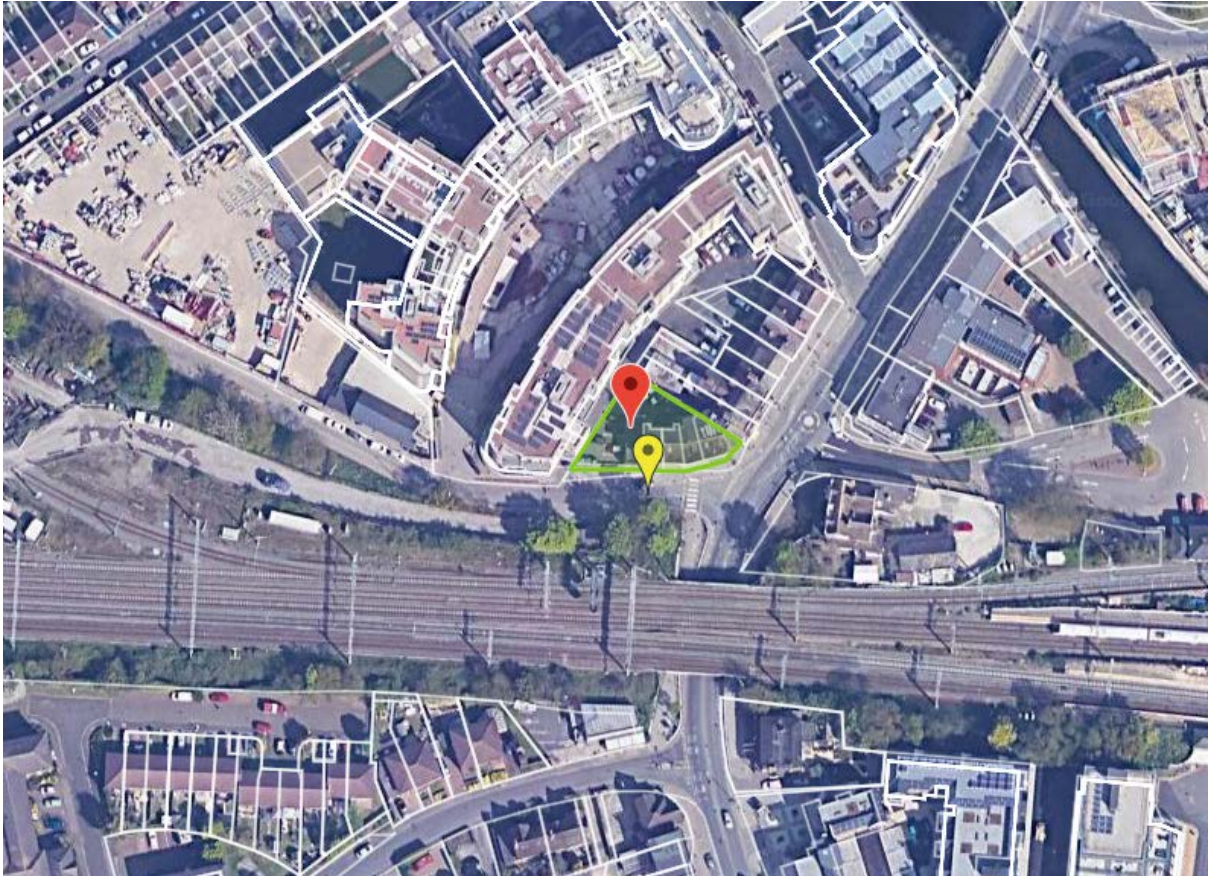
Site 20



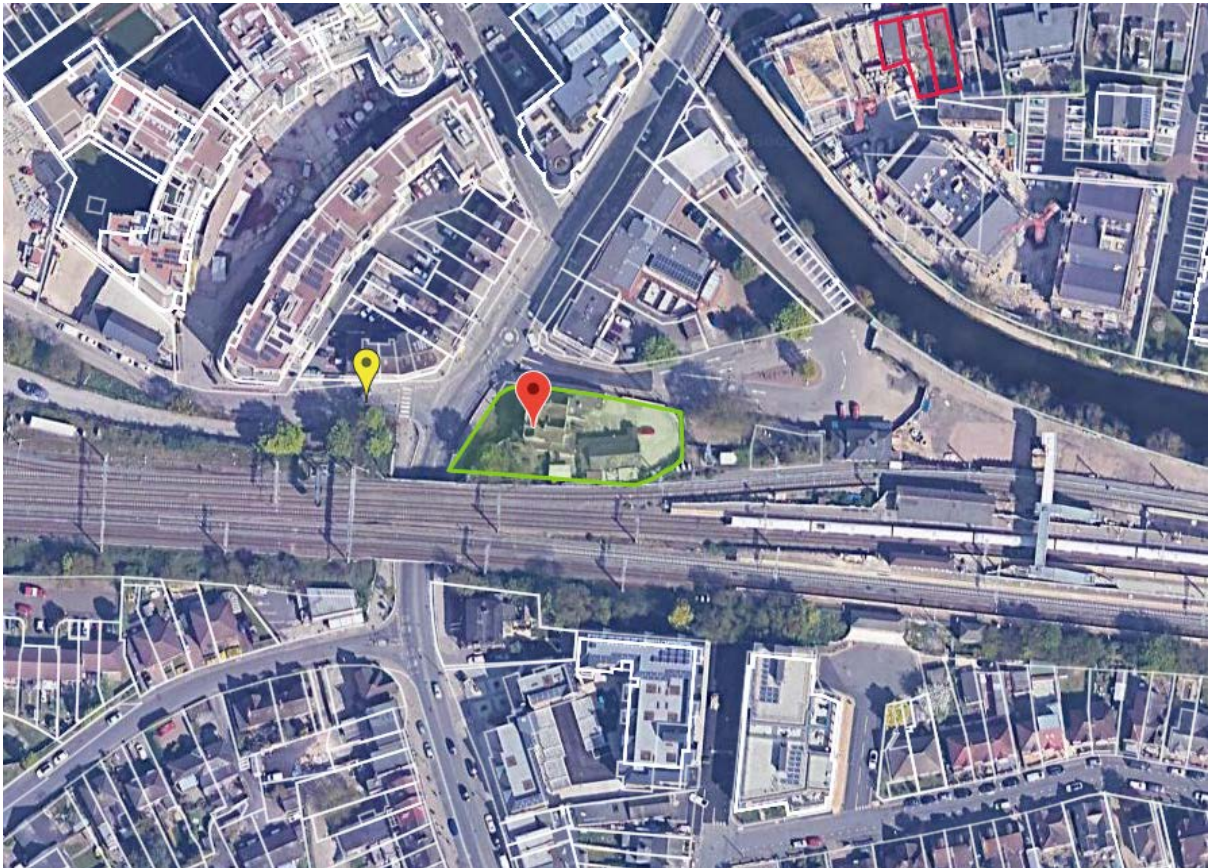
Site 21



Site 22



Site 23



Site 24



Site 25



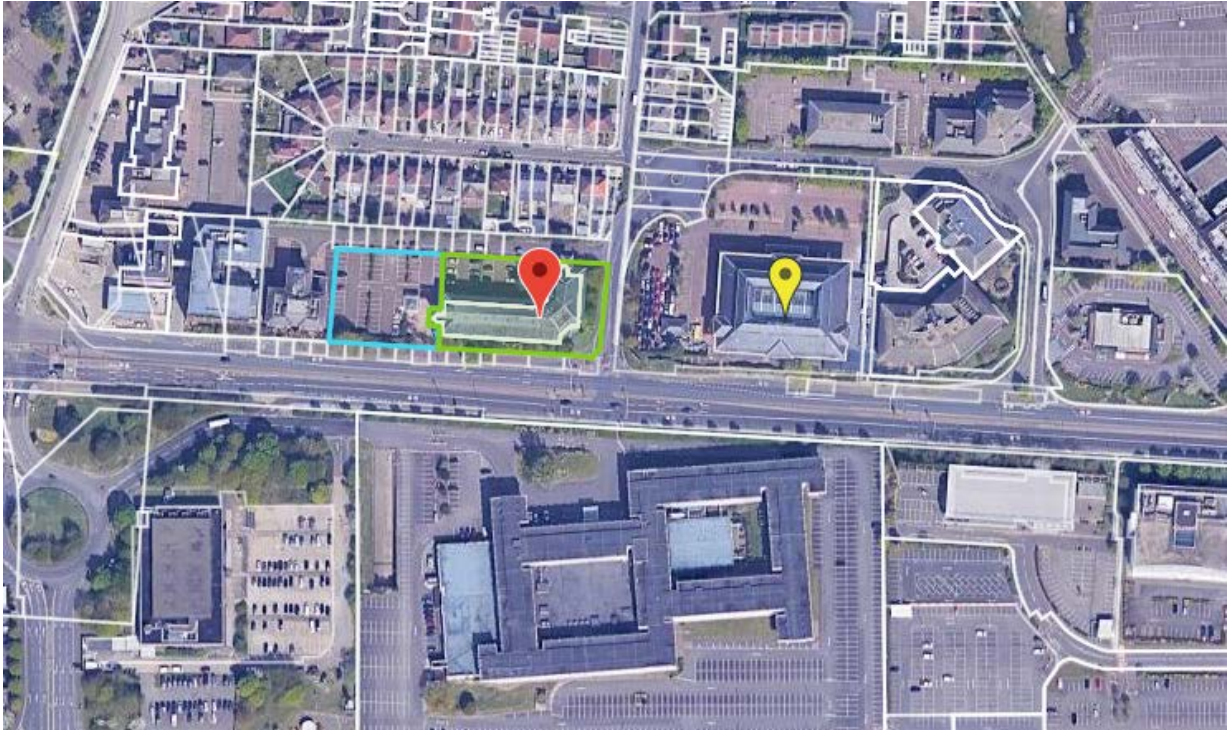
Site 26



Site 27



Site 28



Site 29

