



PROGRESS PLANNING

Land On The South Side Of Bath Road Harlington Hayes UB3 5BJ

Sequential Test

Prepared by Progress Planning on behalf of:

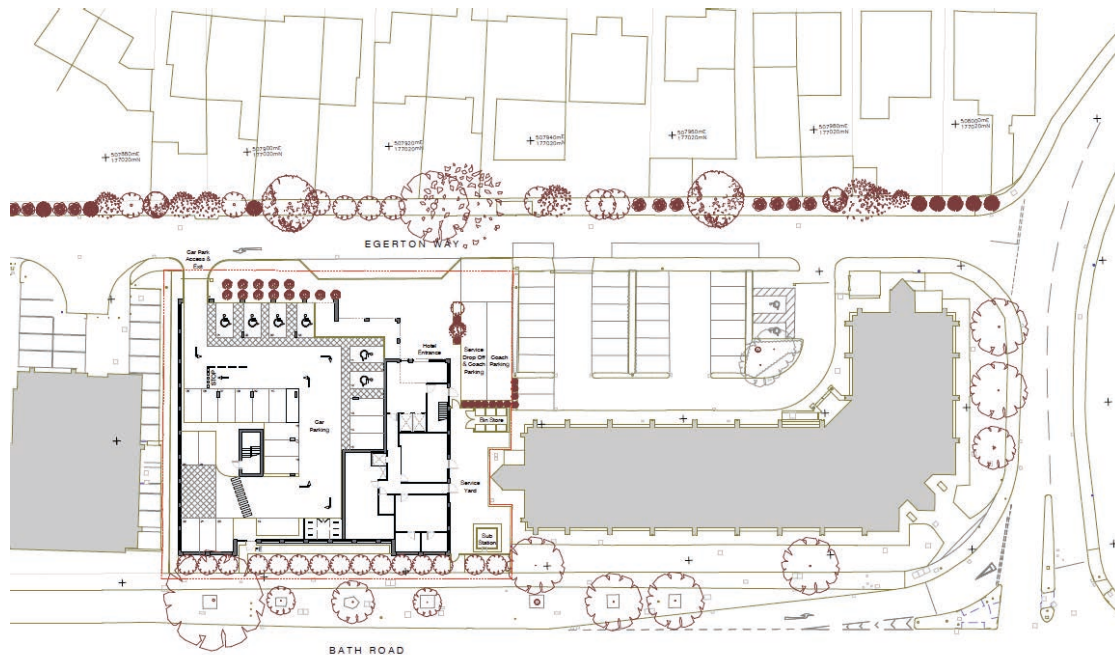
Acre Hotels Limited

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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. 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.

1.2. Figure 1 – site outline



- 1.3. 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).

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 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 room 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. Also, 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 Borough of Hillingdon.

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.
- 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 Hillingdon Local Plan considers a total of 5 district centres and 1 metropolitan centre of Uxbridge.
- 4.4. The five district centres are:
 - Ruislip
 - Hayes
 - West Drayton
 - Northwood
 - Eastcote
- 4.5. 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.
- 4.6. As such, the two districts of Hayes and West Drayton are considered suitable town centre locations for such a proposal due to their geographical location.
- 4.7. 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'.
- 4.8. 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.
- 4.9. 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).
- 4.10. In this instance it is considered the catchment to be Heathrow Airport and the surrounding towns within the London Borough of Hillingdon. 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.

4.11. The sites' location in the context of serving the airport ultimately decides whether a site is indeed unviable or unsuitable within the airport hotel market.

4.12. Map outlining public transport within a 20-minute commuting time.



4.13. The search area considers sites of 20 minutes or less via public transport and within the district of West Drayton and Hayes as in line with the 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 airport. 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.

Site size and area character

- 4.14. 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.
- 4.15. This proposal differs from the previous scheme in that it is an additional storey, however, the ground floor level will now be utilised by parking and as such there are similar number of hotel floors.

Availability and viability of sites

- 4.16. 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. A review of Development Plan and site allocations including the Hillingdon Local Plan Part 2 January 2020, local market analysis, a search of extant or implemented consents in the town centres of Hayes and West Drayton. Note that the existing site has an extant consent for a similar sized hotel.
- 5.3. The proposal continues to monitor emerging information and documents from Hillingdon Council such as the most up to date site allocations.
- 5.4. Each site assessed in the sequential assessment has been judged against the following criteria.
- 5.5. 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.
- 5.6. 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.
- 5.7. 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.

- 5.8. Table - sites in Hayes and West Drayton (in the catchment area shown above)
 – where sites are considered suitable and available, the viability of these sites will be considered.

Town Centre	Site name	Suitable	Available	Viability
Hayes	The Old Vinyl Factory, Blyth Road	Y	N	-
Hayes	Goldmark House, Blyth Road	Y	N	-
Hayes	Land And Buildings On The East Side Of Dawley Road	N	N	-
Hayes	B1 to 4 Clayton Road Hayes UB3 1AN	N	N	-
Hayes	Union House 23 Clayton Road Hayes UB3 1AA	Y	N	-
Hayes	Land On The North-East Side Of Nestles Avenue Hayes UB3 4FS	Y	N	-
Hayes	Silverdale House Pump Lane Hayes UB3 3NB	N	N	-
Hayes	Land And Buildings On The South West Side Of Silverdale Road UB3 3BN	N	N	-
West Drayton	4 Tavistock Road Hillingdon West Drayton UB7 7QT	N	N	-
West Drayton	2 High Street Yiewsley West Drayton and Parking Spaces and Garage UB7 7DH	N	N	-

West Drayton	143 To 161 Odd High Street Yiewsley UB7 7QH	N	N	-
West Drayton	Land At The Rear Of The Railway Arms Public House Station Road West Drayton UB7 7BT	N	N	-
West Drayton	Trout Villa, Trout Road, Hillingdon, West Drayton, UB7 7RT	Y	N	-

6. Summary

- 6.1. The assessment considered the following aspects of location in the context of Heathrow Airport, size of the site and requirements this proposal would need.
- 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.
- 6.4. The Sequential Test and consideration of sites within the catchment area demonstrates 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.