

Sequential Assessment Scoping Note

560 Sipson Road, West Drayton

Proposal

1. As detailed within the application submission (LPA ref: 829/APP/2023/312), the proposal relates to the redevelopment of the site to accommodate a 7 storey, 108-room hotel with associated parking and infrastructure.
2. As detailed within the submitted Planning Statement, the application site is a roughly triangular shaped plot of land (0.27 ha) situated approximately 0.5 km north of Bath Road and the northern perimeter of Heathrow Airport. The land is bound to the north east by Sipson Road, and to the south, east and west by the Park Inn hotel and car parking areas. The surrounding area is characterised by hotel development. It has easy access to Heathrow Airport by road, with hotels utilising shuttle buses and courtesy cars, in addition to the availability of public bus services.
3. The existing premises on the site have been vacant for many years, and the principle of demolition and replacement by a hotel has been accepted through the granting of the previous planning permissions on this site between 2013 and 2018. The last application approved on the site in September 2018 was for an almost identical development to the one sought in the existing application, featuring a 7 storey, 108 bed hotel, associated car parking and infrastructure (LPA ref: 829/APP/2016/3167). This latest permission lapsed in September 2021, largely due to the effects of the COVID-19 pandemic.

Planning Policy Context

4. As outlined in recent correspondence received from officers, since the approval of the 2016 application, the development plan for Hillingdon Council has changed. This now includes the Local Plan Part 2: Site Allocations and Designations document (January 2020), the London Plan (March 2021) and the National Planning Policy Framework (September 2023).
5. The policies relevant to the consideration of main town centre uses and the sequential assessment are as follows:
 - Paragraph 87 of the NPPF (2023) outlines that a sequential test should be applied to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Hotels are listed as a main town centre uses within the Glossary at Annex 2.
 - Policy E10 of the London Plan (2021) outlines that in outer London, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in Policy SD7 Town centres: development principles and Development Plan Documents) where they are well-connected by public transport, particularly to central London. Although the application site is located within the Heathrow Opportunity Area (See London Plan Figure 2.10), Policy SD7 states that a sequential approach should be taken in the consideration of proposals for main town centre uses.

- Policy E2 of the Local Plan: Part 1 (2012) outlines that new hotels and visitor facilities will be encouraged in Uxbridge, Hayes, on sites outside of designated employment land on the Heathrow perimeter and in other sustainable locations. However, following the publication of the Airports National Policy Statement, locations identified on the Heathrow perimeter for Hotel Growth were removed as part of the examination of the Local Plan: Part 2 (2020) due to these sites occupying land that is identified for the expansion of Heathrow.
- Policy SEA2 of the Local Plan Part 2, seeks to direct new hotel and visitor facilities to Uxbridge and Hayes Town Centres which will be the focus of the Sequential Assessment.

Sequential Approach

6. In respect to the application of the sequential test, the interpretation of current case law confirms the following:
 - Disaggregation of a development into its component parts is not a requirement of the sequential test. The sequential approach applies to the totality of the main town centre uses proposed within the development (with appropriate allowance for flexibility) and not to individual components. In this case, the application seeks planning permission for a 7 storey, 108 bedroom hotel with associated car parking which will be accommodated on a site of approximately 0.27 hectares.
 - ‘Suitable’ and ‘available’ generally mean suitable and available for the broad type of development which is proposed in the application by approximate size, type and range of goods. Availability for the type of main town centre uses proposed, not occupier or developer, is key. ‘Availability’ within the NPPF means sites which are expected to become available within a ‘reasonable period’.
 - ‘Flexibility’ has been a central issue in many cases, in particular the extent to which applicants can be reasonably expected to modify or amend proposals when assessing alternative, sequentially preferable sites.
 - The owner or developer of a scheme is not material; the scheme can be marketed to occupiers irrespective of ownership or control.
 - The sequential test is intended to operate in a ‘real world’ context. In this respect, the proposed development could not realistically be delivered in an alternative location if securing the development of a hotel within the Heathrow perimeter to serve the airport within an established destination for hotels is to be achieved.
7. Drawing on the above, the sequential assessment will examine 80% of the minimum site area needed to accommodate the proposed hotel floorspace (0.27 ha) in order to provide an appropriate allowance for flexibility.
8. In accordance with Policy SEA2 of the Local Plan, the outputs of the sequential assessment will explore whether there are any suitable or available sites within or at the edge of Uxbridge and Hayes town centres which are capable of accommodating the hotel floorspace proposed within the application (when allowing for flexibility), having regard to its scale, type of operation and purpose.