

**REF: MR/BH/R00012**

London Borough of Hillingdon
Planning Department
Civic Centre
High Street
Uxbridge
UB8 1UW

8th May 2019

Dear Sir / Madam,

**HILLINGDON LOCAL PLAN PROPOSED MODIFICATION CONSULTATION
REPRESENTATIONS ON BEHALF OF ELITE GROUP LTD**

I write on behalf of Elite Group Ltd, in respect of their interest in Douglas Webb House, Sipson Way and the Local Plan Part 2 Development Management Policies Proposed Main Modifications March 2019. This includes the proposed modifications to the Local Plan which were presented to the Inspector prior to the Examination in Public (EIP) in September, and the proposed modifications which are currently being consulted on. I write specifically with regard to the Draft Policy DME 5 'hotels and visitor accommodation and the removal of Draft Policy E2 'location of employment growth of the Local Plan Part 1'.

In the Plan examined at the EIP there were two hotel and office growth locations to the east and west of Douglas Webb House identified on the Draft Local Plan Part 2 Proposals Map as 'Bath Road Hotel and Office Growth Location'. These were identified as sequentially preferable locations for new hotel and office development. The draft policy stated that outside of these locations that a sequential assessment would need to be undertaken to support new hotel and office development. Following the EIP and the publication of the Inspector's advice note dated 30th November 2018, the Inspector confirmed that "as such, I consider that it unlikely that these allocations will be delivered within the plan period due to the sites occupying land that is land identified with the ANPS2 for the expansion of Heathrow. As such, given the circumstances it is necessary to delete these site allocations". This has therefore removed a large number of sites to deliver additional hotel beds within the Borough, which makes it even more prudent to deliver additional hotel beds on sites such as Elite's site at DWH.

The removal of this Employment and Growth Area from Draft Policy DME 5 is strongly supported by Elite. It is considered that the appeal site is sequentially preferable in its location for new hotel development, given its close proximity to Bath Road and Heathrow. Furthermore, adopted policy T4 confirms that tourist accommodation will be considered acceptable if the site is accessible and within a short distance to Heathrow Airport, provides adequate coach and car parking for future occupants and would not result in harm to the residential amenity.

In conclusion, the amendments proposed to Draft Policy DME 5 'hotel and visitor accommodation' is strongly supported through the removal of the Bath Road Hotel and Office Growth Location. The Council should assess new hotel development in accordance with the requirements of the draft policy provided that there is no adverse impact on nearby land uses or on the amenity of either adjoining occupants or proposed occupants by virtue of noise, lighting, emissions, privacy, overlooking, any other potential nuisance, parking or traffic congestion. In addition to draft Policy T4 which supports visitor



accommodation in accessible locations and in short distance to Heathrow Airport.

We trust that the above is helpful in the context of the proposed modifications consultation which is due to close on 8th May. It would be appreciated if you could confirm receipt of these representations in respect of Elite Group interest in the London Borough of Hillingdon. If you have any queries on the representations enclosed, please contact myself or Beth Hawkins [redacted]

Yours faithfully,



Matthew Roe
Director
ROK Planning

