



HILLINGDON LONDON

Local Plan Part 2

Proposed Main Modifications Representation Form

Representations are invited on the following documents:

- **Local Plan Part 2 Schedule of Proposed Main Modifications**
- **Further Addendum to the Sustainability Appraisal for the Local Plan Part 2**

See end of document for details on how to submit this form.

All forms must be submitted by **5:00 pm on Wednesday 8 May 2019**

PART A - Personal Details

Your Details	Your Agent's Details (if applicable)
Title: Mr / Mrs / Miss / Ms / Dr / Other: Mr	Title: Mr / Mrs / Miss / Ms / Dr / Other: Ms
Surname: Sant	Surname: Peggy
Forename: Punni	Forename: Hui
Organisation/Company: Skyport Enterprise UK Ltd	Organisation/Company: Maven Plan Ltd
Address: [REDACTED]	Address: [REDACTED]
Postcode: [REDACTED]	Postcode: [REDACTED]
Contact No: C/O Agent	Contact No: [REDACTED]
Email: C/O Agent	Email: [REDACTED]

PART B - Your representation.

Please use a separate sheet for each representation

Name or Organisation:

Q1. Which document are you making a representation on?

- Local Plan Part 2 Schedule of Proposed Main Modifications
- Further Addendum to the Sustainability Appraisal

Q2. To which Main Modification does this representation relate?

Development Management Policies

Site Allocation Designations

Please specify which part of the Main Modification you are referring to: Policy Wording, Paragraph, Table or Figure / Map you are referring to:

Policy DEM5 of Development Management Policies

Paragraph 2.24 of the Development Management Policies

Paragraph 4.43 of the Site Allocation Designations

Policy SEA2 of the Site Allocation Designations

Q3. Do you consider the Main Modifications are:

Legally Compliant?

✓ Yes No

Sound?

Yes

✓ Yes, with minor changes No

Q4. If you consider the Main Modifications are unsound, is it because they are not:

Positively Prepared?

✓ Justified?

Effective?

Consistent with National Policy?

Q5. Please give details of why you consider the Main Modifications are not legally compliant or are unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Main Modifications, please also use this box to set out your representation.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and suggested changes.*

The proposed modifications removed all designated sites for “hotel and office growth location” around Heathrow Perimeter, meaning there will be a significant reduction of hotel sites within the airport expansion area during the period of the Plan. The only identified locations for hotels are now in Uxbridge Town Centre and Hayes Town Centre which may not suit certain types of hotel occupiers who prefer to stay closer to the airport and who would be able to access these sites sustainably using the existing hopper bus service.

Without the previously designated hotel growth locations around the Heathrow Perimeter and without any explanations in the Proposed Modifications, it has not been demonstrated whether the plan has allowed sufficient sites to meet the borough-wide target for Hillingdon to deliver 3,800 new bedrooms by 2036. It is important to note that Hillingdon’s Tourism Study estimates this figure to be much higher, suggesting a need for 5,600 additional hotel rooms, and identified the Bath Road area, Hayes and Uxbridge as key locations for hotel growth.

It is therefore considered that the Main Modifications are not justified based on the Hotel Need evidence and that additional hotel sites should be allocated, along Bath Road outside the area of proposed Heathrow expansion, such as those which have previously has granted planning permission but which have not yet been implemented (i.e. 1 and 1A Bath Road, Harlington, TW6 2AA).

Q6. Please set out what change(s) you consider necessary to make the Main Modifications (and so the Plan) legally compliant or sound, having regard to the test you have identified at Q4 above where this relates to soundness. You will need to say why this change will make the Main Modifications (and so the Plan) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:

We recommend the Council review sites that may be suitable for hotels and can contribute to the supply of hotel sites in the Borough. We recommend the Council to consider the site at 1-1a Bath Road, Harlington which has an expired hotel permission (planning reference: 35805/APP/2009/2433) and is currently subject to an application to re-instate that permission (planning reference: 35805/APP/2019/137), on the basis it falls outside the Heathrow expansion area but would still provide a suitable location for hotel development in close proximity to the airport and other hotels in the area that operate under the existing mini bus hopper service.

Revised wording of **Paragraph 2.24** of Development Management Policies as follow:

Hotel growth will be encouraged in Uxbridge, Hayes and at other accessible sustainable locations along Bath Road which were previously granted permission for hotel uses. These areas are identified and designated in the Site Allocations and Designations document (1-1a Bath Road should be an allocated site). In accordance with national planning policy, hotel development of an appropriate scale will also be acceptable in other town centres, subject to the provisions of other policies in this Plan.

Revised wording of **Paragraph 4.43** of site Allocations and Designations as follow:

The Council has reviewed these general locations for hotel and office growth and identified specific boundaries for land designation. The purpose is to spatially define the extent of the area that hotel and office development will be directed to as a first preference. The identification of specific boundaries has been guided by the existing use of land around Bath Road and boundaries have been drawn to include those areas that are already in hotel or office use. Sites that benefit from previous unimplemented hotel planning permissions in accessible sustainable locations would also be preferable for new hotel provision subject to compliance of other policies in the Local Plan.

Revised Wording of **Policy SEA 2** as follow:

In accordance with the evidence base the Council will promote and where appropriate protect a network of Hotel and Office Growth Locations across the Borough.

i) The following locations are designated for both hotel and office growth:

- **Uxbridge Town Centre**, defined by the area shown on Map N.

ii) The following areas are designated for office growth only:

- **Stockley Park LSEL**, as defined by the area shown on Map P

iii) The following area is designated for hotel growth only:

- Hayes Town Centre, as defined by the area shown on Map R; and
- 1 & 1a Bath Road area which is outside the Heathrow perimeter and outside the Bath Road LSEL.

Q7. If your representation is seeking a change, do you consider it necessary to participate at any further oral part of the examination? N.B. it is expected that Main Modifications will be addressed through written representations.

- No, I do not wish to participate at any further oral part of the examination
- Yes, I wish to participate at any further oral part of the examination

Q8. If you wish to participate, please outline why you consider this to be necessary.

Please note: the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. The Inspector may consider that it is not necessary to reopen the hearings and has already indicated that he is unlikely to do so.

In order to ensure this site is properly considered by the Inspector.

Name:

Peggy Hui

Date:

08/05/2019

Would you like to be updated of future stages of the Plan process?

Please indicate which stage(s) of the Plan that you would like to be informed of:

- ✓ The publication of the recommendations of the person appointed to carry out the independent examination of the Plan
- ✓ The adoption of the Local Plan Part 2

Please note that copies of representations will be made available on request for inspection at the councils' offices and cannot be treated as confidential, however personal addresses and signatures will be removed from public copies.

Submitting your representation

Please return this form:

By email: localplan@hillingsdon.gov.uk

By post: Planning Policy Team, 3N/02, Residents Services, Civic Centre, High Street, Uxbridge, UB8 1UW.

All forms must be submitted by **5:00 pm** on
Wednesday 8 May 2019.

Thank you for taking the time to complete and return this representation form.
Please keep a copy for future reference.