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Dear Sir/Madam

REPRESENTATIONS TO THE DRAFT LONDON PLAN

We write on behalf of our client, A40 Data Centre B.V an entity of PPHE Hotels Group to submit representations to the Draft London Plan and its supporting evidence base.

PPHE Hotels owns, leases, develops, manages and franchises primarily full service four star deluxe and contemporary lifestyle hotels in major gateway cities and regional centres primarily in Europe. It is a leading hotel operator who operates 39 hotels across the world. Park Plaza currently operate at 628 Western Avenue adjacent to Park Royal underground station (to the south west) and situated to the north of Western Avenue (A40), between the Hanger Lane junction and the Concord (North Circular) junction.

We welcome the opportunity to make representations on the revised Draft London Plan and we look forward to continued engagement throughout the Local Plan process.

This letter outlines a number of the key comments and observations which we would like to record on the draft of the London Plan mainly relating to the policies relating to Strategic Industrial Land.

Chapter 1 Planning London's Future (Good Growth Policies)

We are strongly supportive of policy GG2 (Making the best use of land) which outlines that development must proactively explore the potential to intensify the use of land, including public land, to support additional homes and workspaces, promoting higher density development, particularly on sites that are well-connected by public transport, walking and cycling, applying a design-led approach. Providing higher density mixed use developments in gateway locations should be supported in London.

We welcome policy CG5 (growing a good economy) which states that development must conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must plan for sufficient employment and industrial space in the right locations to support economic development and regeneration.



Chapter 6: Economy

PPHE recognises the importance of Strategic Industrial Land (SIL) and agrees that it should be protected and intensified so as to optimise its use, enhancing its attractiveness and competitiveness where relevant. However, PPHE also believe that non-SIL uses can complement SIL uses as part of mixed use schemes. Policy as currently proposed includes no flexibility to facilitate such mix uses. Accordingly, it is unduly restrictive, and as such fails to promote development and flexible use of land as the NPPF [157] exhorts. This lack of flexibility is a potential barrier to investment; the antithesis of what the NPPF is seeking [160]. In this respect the London Plan is not positively prepared, justified, effective or consistent with the NPPF.

Policy E5 part C states that development proposals in SILs should be supported where the uses proposed fall within the broad industrial-type activities, such as

- *light industrial (Use Class B1c)*
- *general industrial uses (Use Class B2)*
- *storage and logistics/distribution uses (Use Class B8)*
- *other industrial-type functions, services and activities not falling within the above Use Classes including secondary materials and waste management, utilities infrastructure, land for transport and wholesale markets*
- *flexible B1c/B2/B8 premises suitable for occupation by SMEs*
- *small-scale 'walk to' services for industrial occupiers such as workplace crèches or cafés.*

Part D goes on to state that “*development proposals for uses in SILs other than those set out in part C above, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.*”

Whilst we agree that SIL should continue to provide and protect a mixture of industrial uses as set out above, we believe that in the right location where sites that are providing modern efficient SIL uses, the GLA should consider other additional complementary non-SIL uses to further ‘optimise development.’ For example, in gateway locations next to transport links, other non SIL uses (subject to design and townscape considerations) could be considered acceptable above these SIL uses. By doing this, you would be maximising SIL floorspace on site in locations well served by transport connections and providing additional uses on top that would not prejudice the SIL use but continue to generate employment which is a key driver for London. Such non SIL uses must demonstrate that they would not inhibit existing or potential SIL uses on adjoining sites so that they complement the SIL uses both on and off site.

It is therefore recommended that Policy E5 C should be amended to be more flexible and allow for some sites to provide other non SIL complementary uses, in addition to SIL uses where suitable and where it would not jeopardise the SIL use.



Policy E7 outlines that Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SILs could be intensified. Intensification should facilitate the consolidation of the identified SIL to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal.

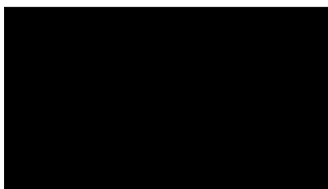
PPHE is supportive of this and agree that parts of SILs could be intensified to support the delivery of residential and other uses (including leisure) that will help contribute to the area, particularly in gateway locations. We strongly believe that SIL can be intensified on sites with additional non SIL uses without compromising the continued efficient function, access, service arrangements and days/hours of operation. The policy restricts this intensification via Development plans and frameworks, however it is our view that on some occasions it would be more expedient to allow this via the planning application process.

We are strongly supportive of Policy E10 (Visitor Infrastructure) and agree London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.

We know that the hotel currently located at 628 Western Avenue is successful and is proving an attractive location for visitor accommodation, particularly in light of its close proximity to Park Royal underground station. The site is located within, but on the edge of the SIL designation and it is our view that this will continue to be an acceptable location for further hotel uses in addition to SIL uses.

We trust that our representations will be fully considered and taken into account as the preparation of the London Plan continues. If you require any clarification on any matters, or wish to discuss our representations further, please do not hesitate to contact David Morris or Hannah Willcock of this office.

Yours faithfully,



DP9 Ltd