

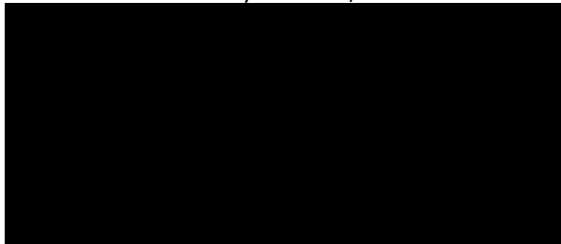
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
First name Martin
Last name Wells
Address Hertfordshire County Council,

Postcode
Telephone, including area code
Email
Organisation (if relevant)



Agent's name and address (if applicable)

Title Nothing selected
First name
Last name
Address
Postcode
Telephone, including area code
Email
Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number
Paragraph number
Table or figure number
Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording

of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) Response on the Hillingdon Local Plan Part 2.pdf

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Hertfordshire County Council as Minerals and Waste Planning Authority, does not wish to object to the planning policy documents that consist of the Proposed Submission Hillingdon Local Plan Part 2. However, the county council has the following observations to make regarding minerals and waste matters.

Waste Planning

The county council has recently adopted its Waste Site Allocations document, which identifies a number of allocated sites and employment land areas of search that are considered suitable in principle for waste management development over a 15 year plan period (2011-2026). However, as none of the allocated sites and employment land areas of search are situated in close proximity to the county boundary with Hillingdon, any neighbouring development within the London Borough will not need to take these allocations into account.

There are a number of existing waste sites within the county that are safeguarded for waste management uses under Policy 5: Safeguarding of Sites, in the county council's adopted Waste Core Strategy and Development Management Policies document. One of these sites (Maple Lodge Sewage Treatment Works) is adjacent to the boundary with Hillingdon and is safeguarded by its virtue as being a sewage treatment works, which also contains a biological treatment facility.

The Minerals and Waste Planning Authority notes that there are no significant development proposals, which have been identified adjacent to, or in close proximity to the sewage treatment works, as shown on the accompanying Policies Map. However, the county council would expect the location of the sewage treatment works to be taken into consideration, should a planning application be submitted adjacent to, or in close proximity to it. This is a requirement under Policy 5: Safeguarding of Sites and part of the policy states that:

“The Waste Planning Authority will oppose development proposals which are likely to prevent or prejudice the use of land identified or safeguarded for waste management purposes.....”

Minerals Planning

Land within Hertfordshire which adjoins the boundary with Hillingdon, is situated within the sand and gravel belt. This is identified as a minerals consultation area in the county council's 'Mineral Consultation Areas in Hertfordshire SPD.' Whilst there are no active sand and gravel workings located in close proximity to the county boundary, the county council would expect to be consulted on any development that does not fall within Section 3: Excluded Development of the SPD.

Hillingdon Borough Council should therefore be mindful of the fact that any planning applications for development that are submitted close to the county boundary, may need to refer to this SPD, in order to ensure that development

proposals do not potentially sterilise mineral bearing land close to the county boundary within Hertfordshire.



Marine
Management
Organisation



By email: localplan@hillingdon.gov.uk

Our reference: 772

22 September 2014

Dear Sir/Madam,

Re: Publication of the Local Plan Part 2

Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.

If you have any questions or need any further information please just let me know. More information on the role of the MMO can be found on our website www.gov.uk/mmo

Yours sincerely



Angela Gemmill
Relationship Manager



INVESTORS
IN PEOPLE

Part A - your details

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Your name and address

Title	Nothing selected
First name	Kenneth
Last name	Morgan
Address	[REDACTED]
Postcode	[REDACTED]
Telephone, including area code	[REDACTED]
Email	[REDACTED]
Organisation (if relevant)	[REDACTED]

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Policies Map (Atlas of Changes)
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To which part of the Local Plan Part 2 does this representation relate:

Policy number	
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	5.1

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

With reference to map 5.1 the white area at the rear of the houses in Merle Ave and the Sports Ground has no natural boundary. Why is it that particular shape and why is it coloured white? On site it is just part of one large field. There appears to be no reason why it should not be made green belt. The only access to the field is via a farmyard or public footpath.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The area mentioned above should be made part of the green belt.

If your representation is seeking a change, do you	No
--	----

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

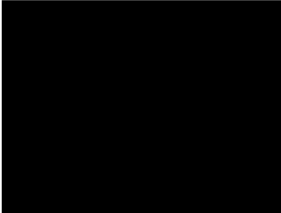
Monitoring



Part A - your details

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Your name and address

Title	Mr
First name	Anthony
Last name	Crane
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Policies Map (Atlas of Changes)
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	5.1

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The sports field for Harefield school and the land adjoining is not included as being added to the green belt proposal.

Please set out what change(s) you consider necessary to include the Harefield school sports field and adjoining land into the green belt proposal. By bringing the sports field into green belt would ensure that the Olympic legacy of sport facilities are up held for local people. Half the adjacent field surrounding the sports field is already in green belt. It is therefore illogical not to include the whole

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

field,
No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
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- The adoption of the Local Plan Part 2.

Monitoring

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

A large black rectangular redaction box covering the monitoring information section.

Planning Policy Team
 London Borough of Hillingdon
 3N/02 Civic Centre
 High Street
 Uxbridge
 Middlesex
 UB8 1UW

Julian Austin
 Consultant Town Planner



09 October 2014

Dear Sir / Madam

**London Borough of Hillingdon- Local Plan Part 2: Site Allocations and Designations
 SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed AMEC to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the current consultation on the above document.

National Grid infrastructure within London Borough of Hillingdon’s administrative area

Electricity Transmission

National Grid has two high voltage overhead lines and two underground cable routes (listed below) within the London Borough of Hillingdon’s administrative area. These form an essential part of the electricity transmission network in England and Wales.

Line Ref.	Description
ZC line	275 kV overhead transmission line from Laleham substation in Spelthorne to Watford substation in Three Rivers via Iver substation in South Bucks
VW line	275kV overhead transmission line from Iver substation in South Bucks to Laleham substation in Spelthorne
Underground Cable	27kV underground cable from Iver substation in South Bucks to North Hyde substation in Hillingdon
Underground Cable	275kV underground cable from Laleham substation in Spelthorne to Ealing substation in Ealing.

The following substation is also located within the administrative area of Hillingdon:

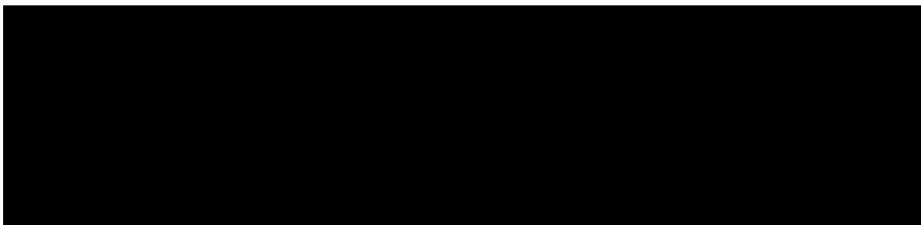
North Hyde 275kV & 66kVsubstation

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

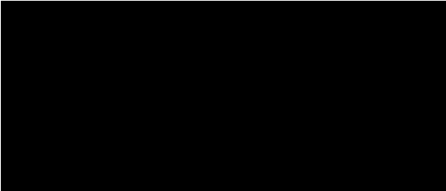
Gas Transmission

National Grid has no gas transmission pipelines within the administrative area of Hillingdon.



Gas Distribution

National Grid Gas Distribution owns and operates the local gas distribution network in the London Borough of Hillingdon administrative area. If you require site specific advice relating to our local gas distribution network then information should be sought from:



UK Power Networks owns and operates the local electricity distribution network in the London Borough of Hillingdon administrative area, further contact details can be found at: www.energynetworks.org

Specific Comments

National Grid has a number of electricity transmission assets which are located within the London Borough of Hillingdon. We have identified the following policies / sites as having the potential to interact with National Grid Assets.

- Policy SA10: Land to the South of the Railway, including Nestle, Hayes (Site A)- located within close proximity to North Hyde substation and National Grid's high voltage underground cables.
- Policy SA25: Cape Boards Site, Iver Lane, Cowley- crossed by National Grid's high voltage overhead line VW 275kv route

We therefore request that the following comments are taken into consideration.

Site in close proximity to substation

While National Grid does not object to future development in the area surrounding the substation site, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. North Hyde substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Hillingdon and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.

Site in close proximity to underground cables

Our underground cables are protected by renewable or permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our electricity transmission network. Hence we require that no permanent structures are built over or under cables or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the cable route or its joint bays and that unrestricted and safe access to any of our cable(s) must be maintained at all times

The information supplied is given in good faith and only as a guide to the location of our underground cables. The accuracy of this information cannot be guaranteed. The physical presence of such cables may also be evident from physical protection measures such as ducts or concrete protection tiles. The person(s) responsible for planning, supervising and carrying out work in proximity to our cable(s) shall be liable to us, as cable(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a cable(s).

The relevant guidance in relation to working safely near to existing underground cables is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.

Our cables are normally buried to a depth of 1.1 metres or more below ground and cable profile drawings showing further details along the route of the particular cable can be obtained from National Grid's Plant

Protection Team. Cables installed in cable tunnels, deeper underground, whilst less likely to be affected by surface or shallow works may be affected by activities such as piling. Ground cover above our cables should not be reduced or increased.

If a landscaping scheme is proposed as part of the works, we request that no trees and shrubs are planted either directly above or within 3 metres of the existing underground cable, as ultimately the roots may grow to cause damage to the cable.

The relocation of existing underground cables is not normally feasible on grounds of cost, operation and maintenance and environmental impact and we believe that successful development can take place in their vicinity.

Site crossed by an overhead line

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:

<http://www.nationalgrid.com/uk/Senseofplace/Download/>

Further information regarding development near overhead lines and substations is available here:

http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm

Map of National Grid Assets

Please find attached in Appendix 1 maps of the sites referenced above in relation to the affected National Grid asset.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development,

please do not hesitate to contact us. In addition the following publications are available from the National Grid website or by contacting us at the address overleaf:

- National Grid's commitments when undertaking works in the UK - our stakeholder, community and amenity policy;
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties; and
- A sense of place - design guidelines for development near high voltage overhead lines.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Julian Austin
Consultant Town Planner



I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely

[via email]
Julian Austin
Consultant Town Planner

cc. Laura Kelly, National Grid

Annex: Overview- National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.

To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London - almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:

- an expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations); and
- new forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

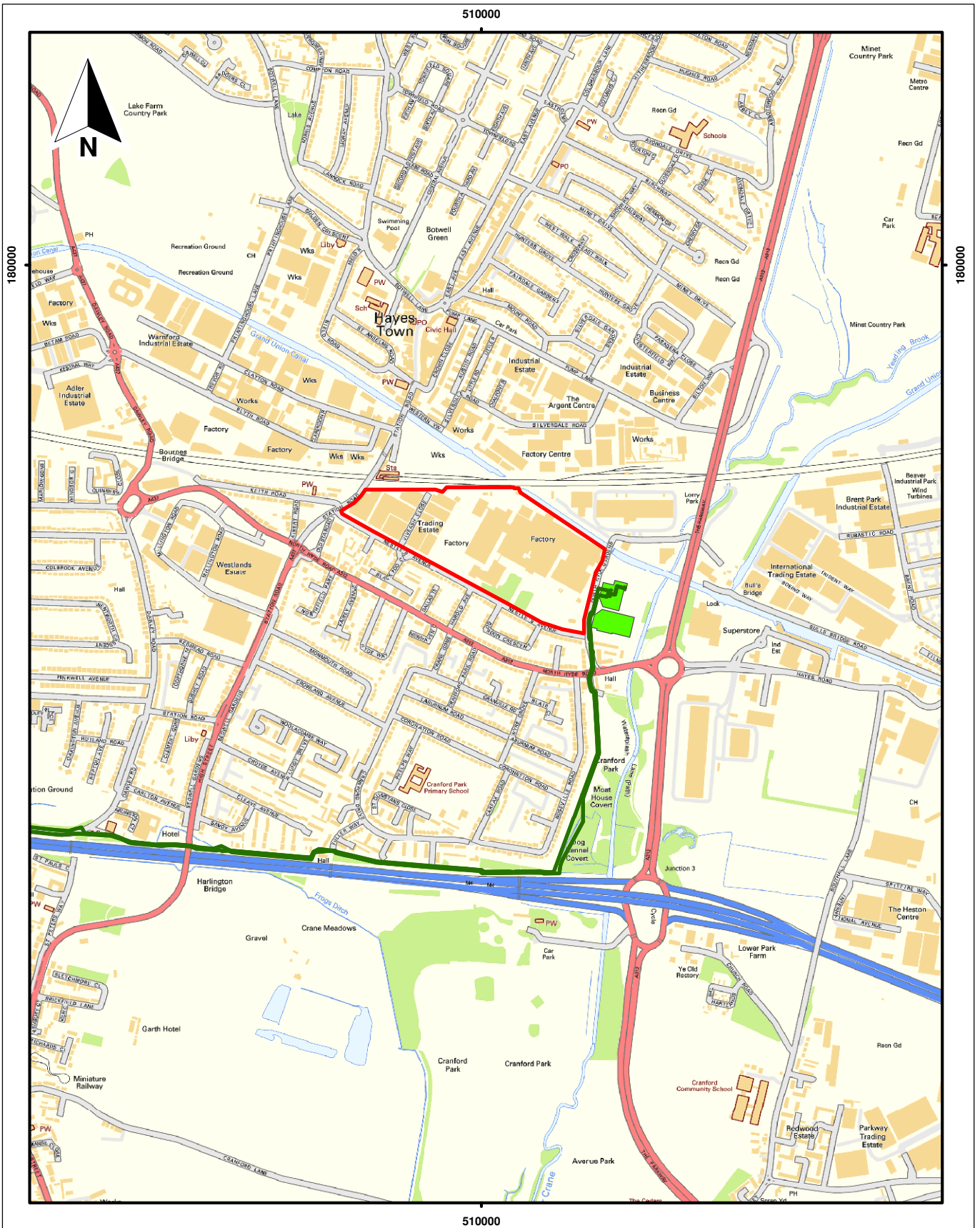
Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.

We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:

- any policies relating to overhead transmission lines, underground cables or gas pipeline installations;
- site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines;
- land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations;
- any policies relating to the diverting or undergrounding of overhead transmission lines;
- other policies relating to infrastructure or utility provision;
- policies relating to development in the countryside;
- landscape policies; and
- waste and mineral plans.

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

APPENDIX 1: NATIONAL GRID ASSETS AFFECTED



Key:

 Indicative Site boundary

National Grid Assets

 Underground cable

 North Hyde Substation

Development Plan Monitoring

National Grid Reference: Site E392

London Borough of Hillingdon

Proposed Development Sites

Type of Development:

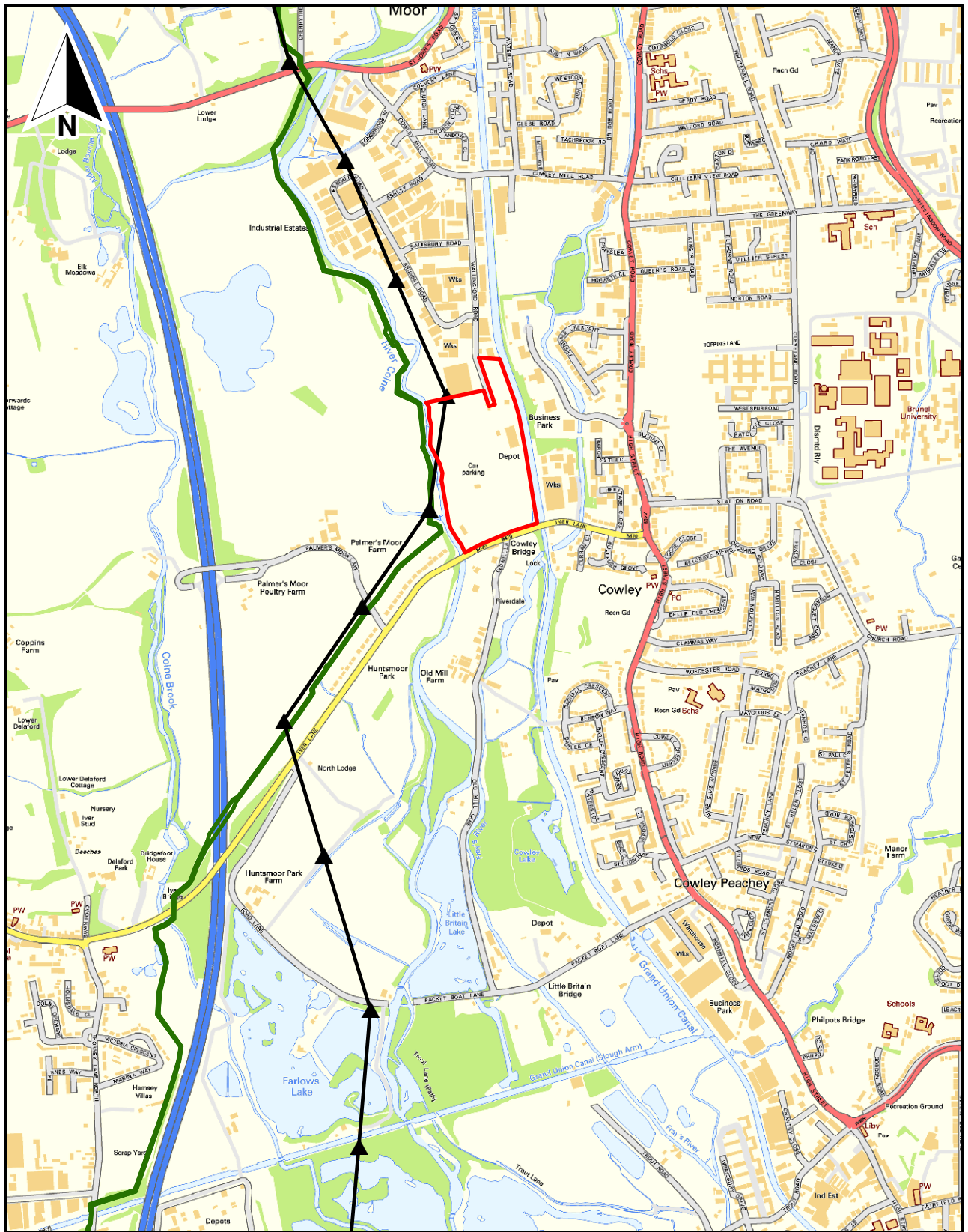
Residential / Mixed Use



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October 2014
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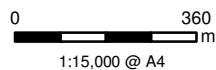


Key:

Indicative Site boundary

National Grid Assets

- Tower
- Overhead line
- Underground cable



Development Plan Monitoring

National Grid Reference: Site E393

London Borough of Hillingdon

Proposed Development Sites

**Type of Development:
Residential / Mixed Use**

September 2014
28277-Lea543.mxd smitv




H:\Projects\28277 Development Plan Monitoring\5 Design\Drawings\GIS\ArcGIS\Figures\Site Plans\28277-Lea543_Site E393.mxd

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Brian
Last name	Collins
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2
	Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Green Chain policy
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input checked="" type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

I urge the Council to retain the Green Chain designation for Pinn Meadows and to keep the existing Green Chain policy to give the greatest possible protection from future development.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

I urge the Council to retain the Green Chain designation for Pinn Meadows and to keep the existing Green Chain policy to give the greatest possible protection from future development.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2

Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

When the Local Plan Part 2 Plan has been submitted for independent examination.

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

The adoption of the Local Plan Part 2.

Monitoring

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





Local Plan <localplan@hillington.gov.uk>

Local Authorities have to carry out SURVEILLANCE for European Protected Species for Local Plans/Development Applications etc. purposes as per ART 11 of the EU Habitats Directive.

1 message

Dr. Klaus Armstrong-Braun <[REDACTED]>

13 October 2014
00:03

To: localplan@hillington.gov.uk

Cc: Dr Klaus Armstrong-Braun <[REDACTED]>

[Local Authorities have to carry out SURVEILLANCE for European Protected Species for Local Plans/Development Applications etc. purposes as per ART 11 of the EU Habitats Directive.](#)

Does the LPA carry out the above and if so how, please?

Klaus (Greek: Victory of the People)
Envirowatch.Eu



Local Plan <localplan@hillington.gov.uk>

Local Plan Part 2 Comments

1 message

Admin - Iver Parish Council <[REDACTED]>
To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

14 October 2014 09:55

Please find below our comments:

Ref: 751/APP/2014/3294 West London Industrial Park, Iver Lane, Uxbridge UX8 2XS

Object - increase of HGV traffic through Iver. If granted, a condition limiting working hours would need to be imposed

to protect residents quality of life.

On behalf of

Iver Parish Council



HILLINGDON
LONDON

**Local Plan Part 2
Regulation 19 Proposed Submission Version
Representation Form**

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			2. Agent's Name and Address (if applicable)		
Title	Mr		Title		
First name	Jon		First name		
Last Name	Chandler		Last name		
Organisation (if relevant)	Museum of London Archaeology (MOA)		Company		
Unit		House number	Unit		House number
House name			House name		
Address 1			Address 1		
Address 2			Address 2		
Town			Town		
County			County		
Postcode			Postcode		
Telephone			Telephone		
Email	Email				

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2		Technical Reports (answer Q1 & Q9 only)	
<input checked="" type="checkbox"/>	Development Management Policies	<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Site Allocations and Designations	<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Policies Map (Atlas of Changes)	<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMHB1, DMHB2, DMHB3
Paragraph Number; or	5. HISTORIC AND THE BUILT ENVIRONMENT, Sections 5.1 – 5.15
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Detailed comments are set out in the Q6 comments, below.

One of the 12 core principles that underpin both plan-making and decision-taking within the NPPF is to 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations' (DCLG 2012 para 17). Current wording of much of the text in sections 5.1–5.15 does not take heritage significance into account but apparently applies policy regardless of the significance of a heritage asset. The result is that the new message of the presumption in favour of sustainable development in NPPF does not come across. This applies to paras 5.4, 5.5, 5.7, policy DMHB1, policy DMHB2 (setting), and para 5.13. See detailed comments in Q6 to address this.

Para 139 of the NPPF states that 'Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets'. There is no mention of such assets in the current wording of the text, with specific reference to para 5.7 and policy DMHB1.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

I have included suggested rewording of the Local Plan Part 2 in the sections below, with comments that provide explanation and justification.

5.4 The Local Plan Part 1 Strategic Objective SO1 and Policy HE1 aim to conserve and enhance Hillingdon’s distinct and varied historic environment, its settings and the wider historic landscape, within the context of sustainable development. The Council will strongly support the retention of heritage assets that are considered by the Council to be of special significance and encourage proposals securing their preservation, conservation or enhancement, and that of their settings, in the knowledge that they are of importance for many cultural, environmental, economic and social reasons.

5.5 Proposals affecting known or possible, previously unrecorded heritage assets will need to be made clear within the planning application, and for those that are considered by the Council to be of special significance, will need to be justified. The applicant will need to demonstrate an understanding of the significance of those assets in an accompanying Design and Access Statement and Statement of Significance. Similarly, application drawings will need to show an appropriate level of detail as to how the proposal would affect known and possible heritage assets. For above ground heritage assets (eg historic buildings), historic character and setting would need to be considered and this would normally need to include the street scene as a whole.

5.6 The impact of proposals affecting above ground heritage assets will be assessed having regard to emerging and adopted supplementary planning documents, character appraisals, including the Council's Townscape Character Study and management plans and other relevant documents. Relevant design considerations will include proportion, scale, height, massing, bulk, alignment, materials, impact on historic fabric, floor plans, character features and relationship with the wider setting. The desirability of increasing understanding and interpretation of and public access to, heritage assets will also be taken into consideration

5.7 Development which includes proposals for renewable energy technology must consider their impact on designated heritage assets and their settings. Energy proposals should either be carefully located to ensure there is no adverse impact on the asset or alternative solutions sought to address sustainability objectives. Proposals for renewable energy considered to impact detrimentally on a designated heritage asset (or an undesignated asset of equivalent significance), or its setting, will not be supported.

Policy DMHB1: Heritage Assets or undesignated Heritage Assets considered by the local

Comment [JC1]: As set out in the NPPF there is a presumption in favour of sustainable development but there is little mention of this in sections 5.1–5.15

Comment [JC2]: The term 'heritage asset' covers a broad range of assets, from buried remains of Victorian basements and post-medieval agricultural ditches through to listed buildings and remains of high significance. These constraints should surely only apply to heritage assets that the Council considers have particular significance.

Comment [JC3]: see above comment regarding asset significance. Victorian basements and post-medieval ditches are heritage assets - will the planning applicant need to do this for these assets of low significance?

Deleted: , and t

Deleted: relate

Deleted: to

Deleted: the

Deleted: and

Comment [JC4]: The applicant wouldn't need to do this for buried heritage assets (archaeology)

Comment [JC5]: As NPPF

Deleted:

Deleted: ¶

authority to be of equivalent significance

- A) Development that has an effect on **such** heritage assets will only be supported where:
 - i) it sustains and enhances the significance of the heritage asset and supports viable uses which add to the local character of an area and are appropriate to the conservation value of the asset; and
 - ii) it does not result in harm or loss of significance of the heritage asset.
 - iii) Any extensions or alterations should be designed in sympathy, without detracting from, or competing with, the heritage asset. Proposals should relate appropriately in terms of siting, style, scale, massing, height, design and materials.
 - iv) New buildings and structures within the curtilage of a heritage asset, or in close proximity to it, should not compromise its setting. Opportunities should be taken to preserve or enhance the setting, so that the significance of the asset can be appreciated more readily.
- B) Development proposals affecting designated heritage assets need to take account of the effects of climate change without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

Comment [JC6]: Surely this policy refers to designated assets or assets or equivalent (ie high or very high) significance? It would be unreasonable to apply this to assets of lesser significance and does not fit well with the context of the NPPF in that response should be proportionate to an asset's heritage significance

Policy DMHB2: Scheduled Ancient Monuments

Scheduled Ancient Monuments **will** be required to be preserved. Development that would materially alter, or damage important archaeological remains of national importance will not be permitted unless there are very exceptional circumstances. **The Council will resist proposals that will have a detrimental effect on the setting of a SAM, where setting currently enhances its historic character and understanding of its significance. The Council will consider favourably those proposals that will enhance the setting of a SAM and understanding of its heritage significance.**

Comment [JC7]: The Ancient Monuments and Archaeological Areas Act does not extend to the statutory protection of a monument's setting.

Deleted: and their settings

Comment [JC8]: Not all current settings enhance these assets and may have a significant negative and detrimental effect which one wouldn't want to preserve. There might be proposals being put forward that will provide opportunities to enhance the character and setting of the monument, and understanding of its significance; such proposals should be encouraged.

Archaeological Priority Areas

5.11 In addition to Scheduled Ancient Monuments, Map 7.1 of the Local Plan Part 1 identified nine 'Archaeological Priority Areas' in the Borough, which are **considered** to have **high potential for remains** of Prehistoric or Saxon/Medieval date. An Archaeological Priority Area (APA) is an area, designated by the Council to **which recognises the higher potential for significant buried heritage assets and ensures that these have special consideration within the planning process**. All applications in APAs are referred to **Greater London Archaeological Advisory Service** within English Heritage who provide specialist advice on archaeology on the Council's behalf.

Deleted: and Archaeological Priority Zones

Deleted: known

Comment [JC9]: 'known' would have to be demonstrated; 'likely potential' would be a more accurate statement.

Deleted: deposits

Deleted: a

Comment [JC10]: The original wording sounded as if there is an intention to preserve *in situ* any remains within an APZ. This would only be justified for remains of national significance, which are uncommon.

5.13 APAs will be regarded by the Council as a material consideration in the determining of planning applications. Applicants submitting proposals for development in these areas will be expected to assess the archaeological implications of these proposals, submitting a **desk-based Historic Environment Assessment (HEA)** with their application. **Depending on the conclusions of the HEA site-based archaeological evaluation may be required to clarify archaeological potential and significance and the impact of the proposed development. The evaluation would need to be carried out in accordance with a Written Scheme of Investigation (WSI) approved by the Council. Depending on the results of the evaluation, further mitigation may be required**

Deleted: protect

Deleted: buried archaeological remains from the adverse affects of development

Comment [JC11]: It would be useful to distinguish between the GLAAS part of English Heritage which provides development control advice, and other functions within English Heritage - Inspectors of Ancient Monuments - which provide advice to the Secretary of State

Deleted: Method Statement

in the form of preservation in situ of remains of national significance, or preservation by record (targeted archaeological excavation and recording prior to construction, including preliminary groundworks, or an archaeological watching brief during construction) for remains of lesser significance.

5.14 In the event that the Council are minded to grant planning permission, developers or landowners should be prepared to enter into planning obligations to ensure that the funding, completion and reporting of archaeological investigations take place. Copies of archaeological reports will need to be submitted to the Greater London Historic Environment Record (HER), held by English Heritage. The HER is the a comprehensive computerised database of designated and non-designated historic assets and sites of archaeological and historic importance within Greater London.

Comment [JC12]: The original wording read as if any ground intrusion would require archaeological field excavation. It is not always the case that fieldwork would be appropriate. The preliminary desk study (HEA) might find that the archaeological potential is negligible as existing basements have already removed everything of archaeological interest. I have provided a suggestion for alternative wording.

Deleted: Ground workings should not take place without appropriate archaeological investigation and the recording and archiving of archaeological remains, all of which should be carried out to meet agreed research objectives

Comment [JC13]: Stronger wording. This is a requirement.

Deleted: should be

Deleted: made available

Comment [JC14]: There are other data sources - such as London Archaeological Archive and Research Centre - which can be argued are currently more comprehensive than the HER in terms of the record of past archaeological investigation. The HER is in the process of being enhanced for central London as part of the London Urban Archaeological Database. This area of enhancement of past investigations does not unfortunately extend as far as Hillingdon.

Deleted: latter

Deleted: most complete

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

HAREFIELD TENANTS AND RESIDENTS ASSOCIATION

Chairperson

Mr Paul Stone



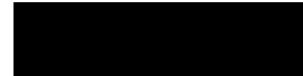
Secretary

Mrs Wendy Rice-Morley



Treasurer

Ms Helen Conchar



Dear Sir,

Re: Local Development Plan Part 2
Specific reference Land West of Merle Avenue, Harefield

I am writing as Chairman of the Harefield Tenants and Residence Association (HTRA) on behalf of our members with reference to the above and refers specifically to the Proposal Map dated February 2014.

The HTRA are delighted to note that on the Proposal Map extensions to nature conservation sites i.e. Summerhouse Lane, Hill End Pond, Summerhouse Lane Chalk Pit, Medi Park site, and New Years Green Lane. The Cricket Club and both the Allotments and Land by Dovedale Close are listed for Green Belt status but we would draw your attention to what we consider to be two serious omissions.

The first, mark one on our map, refers to the small parcel of land at the rear and the end of Merle Avenue. This area is surrounded by existing Green Belt land, meets the same criteria as current Green Belt land and has no direct access. Consequently, we are left to ask what exactly is so different about this particular piece of land that marks it as being unsuitable for Green Belt designation? The current green belt boundary is illogical, a definable and logical boundary is to include this land in the green belt. To leave this land outside of the green belt is unjustified and ineffective in protecting this land from encroachment. We therefore petition for this plot of land to be granted Green Belt status within the LDP part 2 2014, this will assist in safeguarding the Countryside from encroachment.

The second area, marked two, refers to the Sports Ground (aka School Playing field). Currently this is being well used by Pupils from the newly enlarged Infants and Junior Schools and also by various groups for Football practice and other Sporting activities. Its physical situation is the same as area one, namely surrounded by existing Green Belt land and without direct access. We therefore petition for this plot of land to be granted Green Belt status within the LDP part 2 2014, this will assist in safeguarding the Countryside from encroachment .

These two issues have been discussed at a number of our meetings since March this year, at our regular monthly meeting on the 13th October 50 plus residents attended and agreed we should submit these comments. Residents are concerned about the potential loss of these amenities and urge Officers to do all they can to ensure that these excellent facilities are preserved for future Generations. The best way to ensure this would be to designate both areas as Green Belt.

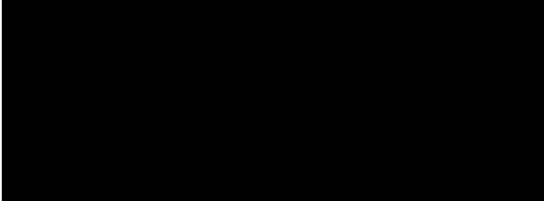
Regards

Paul Stone

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	paul
Last name	stone
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	chairman harefield tenants and residents ass

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Policies Map (Atlas of Changes)
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	5.1

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

unsound and ineffective in preserving these plots marked 1 and 2 from encroachment please see htra 13th oct .I am having trouble attaching my map to this on line comment ,so I have sent it by post as well.

Please set out what change(s) you consider necessary these plots of land should be given green belt status to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I wish to represent harefield village to the best of my ability and ensure we are heard and the wishes of the residents taken notice of.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Letterhead - new ldp htra13th oct meeting.doc

I am commenting on

Local Plan Part 2
Policies Map (Atlas of Changes)

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

5.1

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

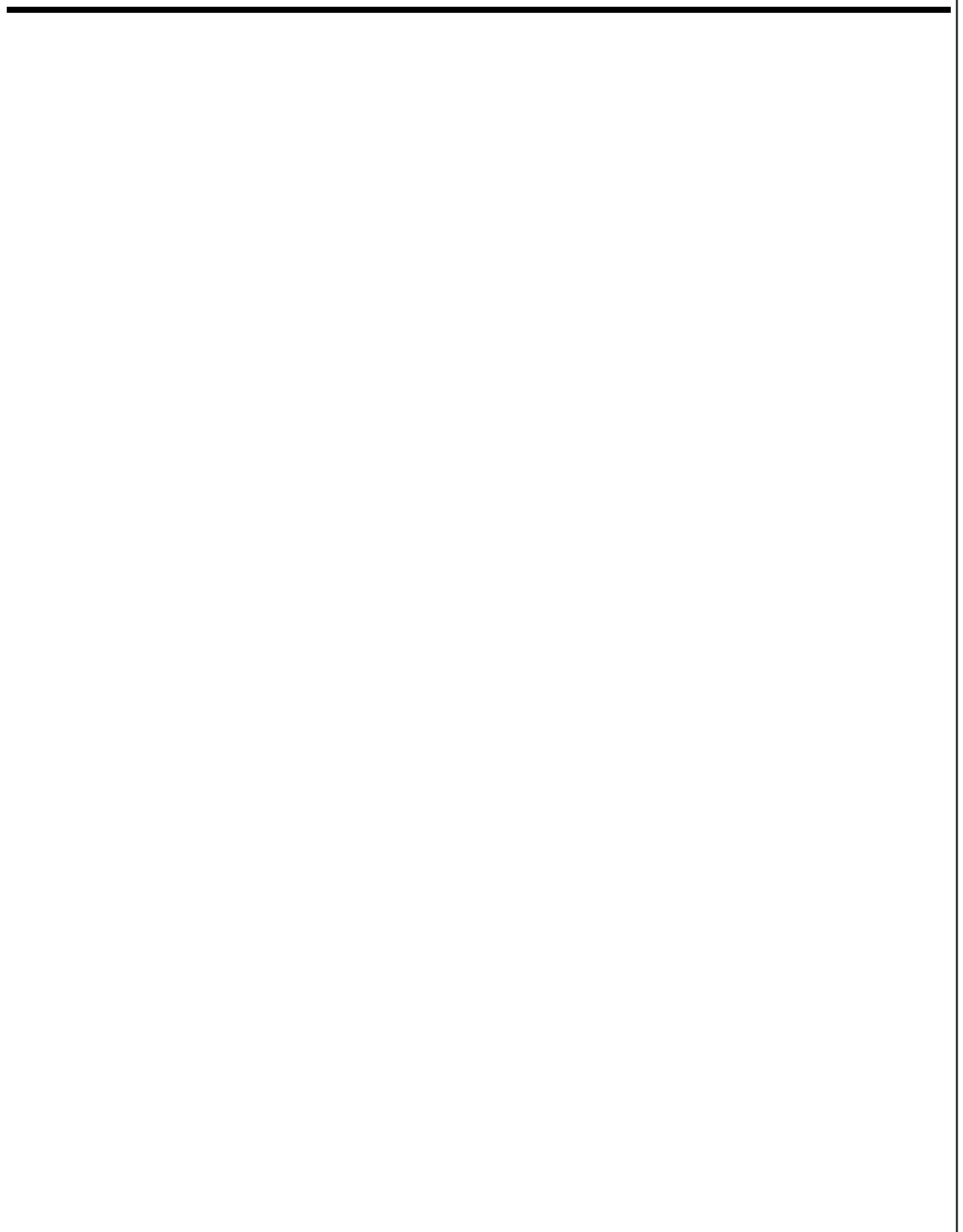
Which would you like to be informed of:

When the Local Plan Part 2 Plan has been submitted for independent examination.

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

The adoption of the Local Plan Part 2.

Monitoring



HAREFIELD TENANTS AND RESIDENTS ASSOCIATION

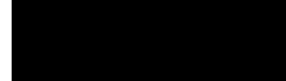
Chairperson
Mr Paul Stone



Secretary
Mrs Wendy Rice-Morley



Treasurer
Ms Helen Conchar



Attention of James Gleave Planning Policy Team Manager

LOCAL DEVELOPMENT PLAN PART 2

The Harefield Tenants and Residents Ass are delighted that the Cricket club and the allotments and land by Dovedale Road are listed for green belt status but are concerned of a very clear omission listed below.

Re map enclosed, The area marked 1 part of a field already protected by greenbelt.

This area is surrounded by green belt and has no access to it, there is no reason why this land should not be given the green belt status to protect Harefield from unwanted development and further encroachment into our green fields. Why would you not consider this land for green belt status? It must fit the requirements as the land that surrounds it is green belt there is nothing different about this land than the land already in the green belt.

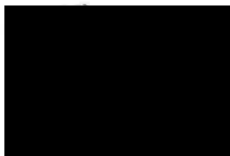
Map marked 2

Sports ground or school playing field, this land is also without access and surrounded by green belt, it is well used by the newly enlarged infants and junior schools as well as football practise by various groups. We need to ensure these facilities are there for future generations to enjoy. Please put this field under green belt status.

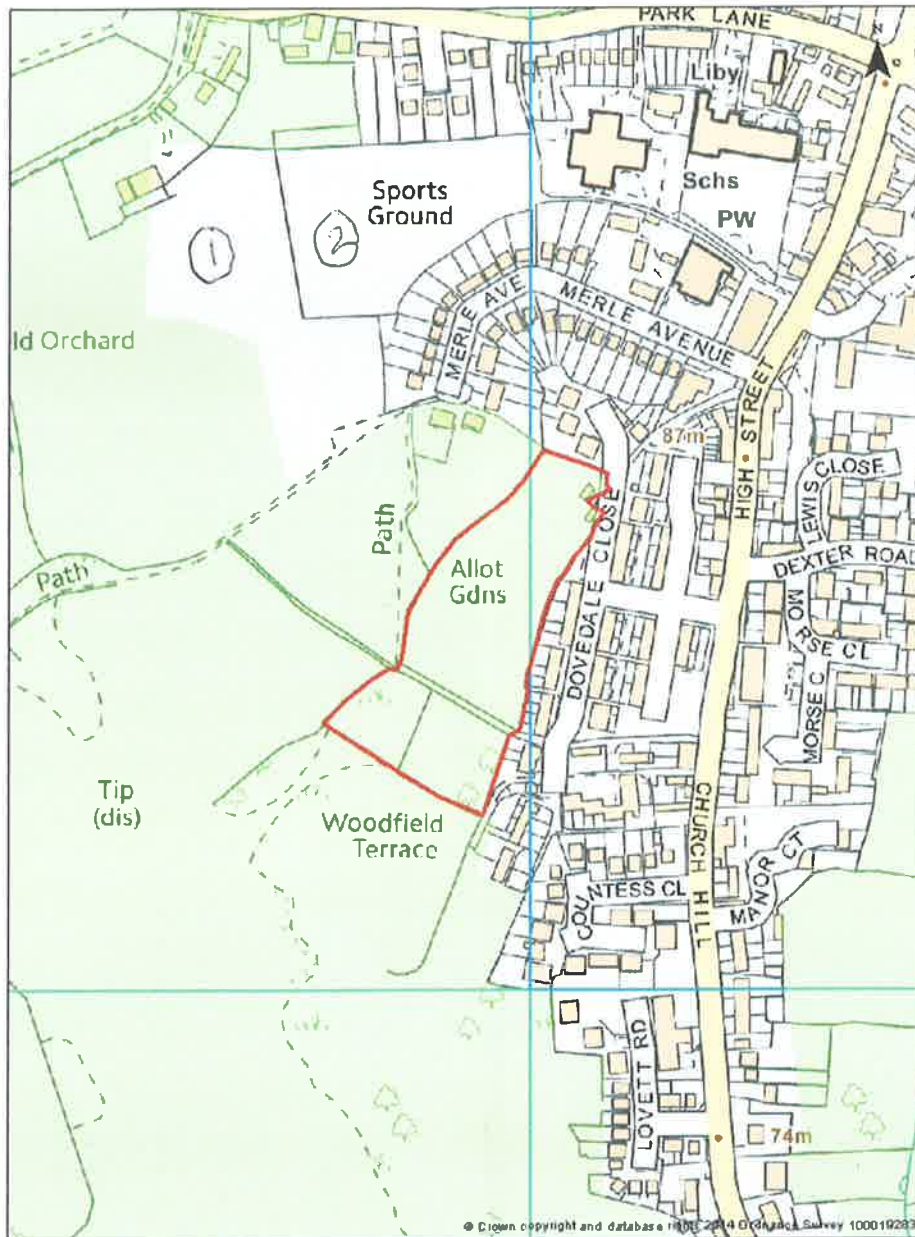
This letter is submitted on behalf of the Harefield Tenants and Residents Ass.

Kind Regards

Paul Stone
Chairman



PROPOSED AMENDMENTS TO UDP PROPOSALS MAP
FEBRUARY 2014



- Existing Green Belt
- Area to be added to Green Belt

Land West of
Merle Avenue, Harefield



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address		2. Agent's Name and Address (if applicable)		
Title	Mrs	Title		
First name	TINA	First name		
Last Name		Last name		
Organisation (if relevant)	WANG HARFIELD TENANTS & RESIDENT ASSOCIATION	Company		
Unit	[REDACTED]	Unit	House number	
House name		House name		
Address 1		Address 1		
Address 2		Address 2		
Town		Town		
County		County		
Postcode		Postcode		
Telephone		Telephone		
Email		Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	SINC EXT 11
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

PLEASE FIND ATTACHED A
STATEMENT OF REPRESENTATION
IN SUPPORT OF THE LBH,
LOCAL PLAN PART 2.

Please continue on a separate sheet if necessary

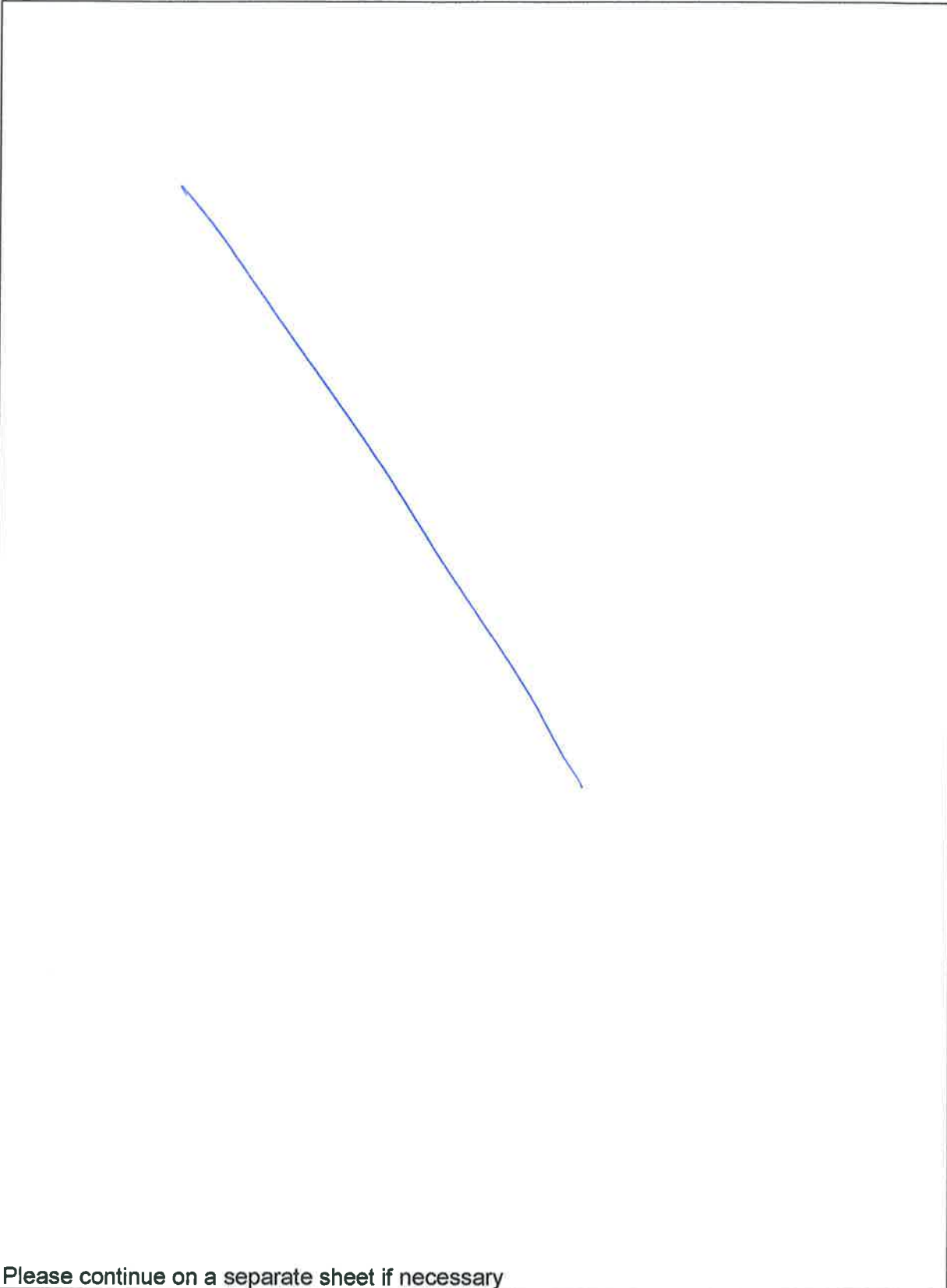
Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To STRENGTHEN THE COUNCIL'S RECOMMENDATION AND TO ADD LOCAL KNOWLEDGE. IF REQUIRED.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.



Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillington.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillington.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions





HAREFIELD TENANTS AND RESIDENTS ASSOCIATION

Chairperson Secretary Treasurer

Local Development Plan Response from the Harefield Tenants and Residents Association

The Harefield Tenants and Residents Association wishes to SUPPORT Hillingdon Borough Council's Local Development Plan to adopt the Medi Parc Site, Harefield as a Grade 1 SINC.

Because of the location of the Medi Parc Site - next to a SSSI Ancient Wood, and surrounded by green belt land the Site has over many decades been a haven for Flora and Fauna and a buffer for the protection of Old Park Wood.

The GLA in 2003 recommended the site be adopted as a Grade 1 SINC, attached to this Representation are copies of the following correspondence:-

- A memo dated 23 November (possibly 2001) regarding a meeting with Julie Brownbridge and highlighting the rarity of the site.
- Letter dated 8 July 2002 from Julie Brownbridge (GLA) to Colin Roome (LBH) recommending whole site as Grade 1 SINC.
- Letter dated 29 July 2003 from John Archer (GLA) to Janet Rangeley (LBH) confirming the site is suitable as a Grade 1 SINC.
- Memo undated from GLA listing the rare plants on the Medi Parc site.
- Letter dated 23 June 2008 from Sue Coldwell (local amateur botanist) to Open Spaces Dept. (LBH) asking if the site has been granted a Grade 1 SINC.

Appendix 1 - 5

- Two further letters from Sue Coldwell dated 9 & 28 September 2014 outlining the species that were and are still on the Medi Parc site.

Attached are copies of various nature walks lead by Sue

Appendix. 6a&b + 7 a-g

Until recent years the Medi Parc Site had remained undisturbed for decades; the area a beautiful location teeming with species, (plants, bees, butterflies, damselflies) of all sorts. Although, the owners have had an impact on the site, the Medi Parc site still supports a wide variety of species and because of its location will always attract wildlife.

Attached photographs taken by Mr. & Mrs. Wane, 1 Tanrey Cottages, of the site in 2009 (before) and in 2010 (after the landowners clearances)

Appendix 7h-i

PLANNING APPLICATION SURVEY

Possibly the most recent formal survey of the site, is attached to a new planning application to develop the Medi Parc site. Planning Application 69751/APP/2014/2906. Attached to the planning application is an Ecology Report by Biodiversity by Design. In that report this company notes the following:-

FLORA

'Executive Summary' - eco report appendix 2 - 8.1 (second paragraph)

Immediately prior to the planned survey the grassland areas had been cut and vegetative material shredded (a forage harvester had been used), which rendered accurate grassland community and sub-community identification difficult. Nevertheless, a NVC survey was completed over the site, albeit significantly constrained with regard to community/sub-community identification and the gathering of full species for the grassland habitats. To ensure accuracy of the site's botanical evaluation a second NVC survey was agree and planned to occur one month later. Unfortunately on the day of that survey the grassland area had once again been cut with a forage harvester. Grasses identified, Squirrel-Tail and

Rat's-Tail Fescues eco report executive summary appendix 8.1.

See attached photocopy of page

Appendix 8

The attached letters from Sue Coldwell show that during her survey of the site recovery had taken place and the flora had re-established.

INVERTEBRATES

Executive Summary - eco report appendix 2 - 8.3 (third paragraph)

The report carries on the say:-

Fieldwork was conducted primarily on 23 May, 24 June, 1 July, and 15 July 2013. Further opportunities to record invertebrates were taken during visits to carry out bird survey work on the 11th and 17th June. A total of 276 invertebrate species were recorded, which allowed for a robust and accurate assessment of the importance of the site for invertebrate conservation. Of these species, 1 is listed as a Species of Principal Importance and 10 have restricted UK distributions:

Cinnabar Moth - Species of Principal Importance - eco report page 18/56

Hoverfly - Red Data Book 3 - eco report page 19/56 table 3.5.

Two types of Weevil, Brown Tree Ant, Roesel's Bush Cricket, Mirid Bug, Black-headed Cardinal Beetle, and two further species of Beetle. -eco report page 19/56.

See attached photocopy of relevant pages, nos....

Appendix..9 + 10

AMPHIBIANS

Great Crested Newts - European Protected Species

Quote from report - *'The presents of breeding GCN in four ponds within 500m of the Site suggests there is the potential for this species to be present in suitable terrestrial habitat on the Site..... While grassland habitats can be important foraging habitat for GCNs, the existing management of the grassland (regular mown to a short sward) renders them unsuitable.' 'On the basis that it is possible for parts of the Site to be used by GCNs.....This population is considered to have an ecological value significant at least at the District/Borough scale, and perhaps higher if a part of the larger county/regional meta-population'. eco report page 32/56 + site plan page 21/56*

See attached photocopy of relevant pages, nos.....

Appendix 11 + 12

Great Crested Newts have been seen by local residents in the gardens backing directly onto the Medi Parc site and the Hill End Road Allotments next to the Site.

See attached photographs taken by Mr R Elphick no. 4 Tanrey Cottages in 2011 and 2014 and email from the Metropolitan Wildlife Police

Appendix 13+14+15
&16 a-c

Smooth Newt and Common Toad - Species of Principal Importance

A smooth Newts was discovered on the Medi Parc site - eco report page 21/56. It was also noted in the Executive Summary that the Smooth Newt and Common Toad we present in the survey areas. - eco report appendix 8.3.

See attached photocopy of relevant pages. nos.....

Appendix 11+17

REPTILES

The on site survey noted that Grass Snakes - Species of Principle Importance, were in several parts of the Site - eco report 22/56

See attached photocopy of relevant pages

Appendix 18

Although the Ecological Survey did not discover any additional reptiles on site, Slow Worms and Common Lizards have been seen in the gardens backing onto the Site.

BIRDS

The report states:-

Field Survey - 'Song Thrush was found to be probably breeding on the survey area, Bullfinch was found to be possibly breeding on the survey area, Marsh Tit was found to be foraging on the survey area in a post-breeding flock. - eco report page 24/56.

See attached photocopy of relevant page

Appendix 19

Amongst 54 species of Birds the survey recorded in the area the follow are species on the Red and Amber List:-

Survey Record-

RED LIST *Marsh Tit (breeding)
*Song Thrush (breeding on site)
AMBER LIST Stock Dove (Breeding + foraging)
Whitethroat (Breeding on site),
*Bullfinch (Breeding on site? foraging)
Dunnock (Breeding on site).
RED LIST *Lapwing (flying over),

*Herring Gull (flying over)
*Starling (foraging in adjacent horse field)
*Linnet (flying over)
AMBER LIST Black-headed Gull (flying over)
Swift (flying over)
Green Woodpecker (in OPW)
Swallow (flying over)
Mistle Thrush (flying over),
Gadwall (in adjacent field)
Mallard (in adjacent field)
Red Kite (flying over)

* Protected status - London/UK BAP section 41 NERC Act. - eco report appendix 8.5. pages 14-18/19,

It was noted in the report that this was quite an important site for the Song Thrush and a healthy population was noted on the site. This bird in recent years have been in decline so the presence of this bird on site is very significant and needs to be considered.

BATS

Ecology Report Protection & Conservation Status - '*All bats in the UK enjoy full protection... .. This requirement can be considered to afford indirect protection to any habitat or feature away from such roosts that may be important in maintaining that conservation status. This may include some key foraging and commuting areas... ..'* eco report page 24 & 25/54

Transect Survey - '*The transect survey confirmed at least five bat species using the site. These were*

Common Pipistrelle, Soprano Pipistrelle, Serotine, Noctule and a least one Myotis species.....sonogram analysis confirmed Brandt's to be present. 'eco report page 26/56.

See attached photocopy of relevant page

Appendix 19,20,21

The Report also states:-

Quote:- *'The recording system employed by Anabats can only respond to the signal with the highest intensity at any time. As the signal from some bat species (such as Common Pipistrelle) will nearly always be more intense than that of other bat species (such as Myotis bats), it is possible that some bat signals were not recorded. As a result, some bat activity may have been under-recorded. The height at which Anabats were positioned may have limited the recording of some bat activity across the stations.* eco report appendix 8.6, page 19/52.

See attached photocopy of relevant page

Appendix 22

Badger

The Ecology Report mentions a survey carried out in January 2011, although no details of this survey have been submitted, therefore, it is unclear who conducted the survey, and what was found.

Badgers are fully protected under Protection of Badgers Act 1992 and the Wildlife & Countryside Act 1981. The only reference in the Ecology Report is as follows:-

'Occasional signs of badger activity (single dung-pit and signs of foraging activity) were noted on the site over 2 year course of surveys of the Site, all from along the western boundary of the Site with the SSSI' (page 29/56)

See attached photocopy of relevant pages

Appendix 23

The local residents regularly see Badgers crossing Hill End Road between White Heath Farm and the Medi Parc. All the residents of Tanrey Cottages have had Badgers foraging in their gardens in the passed 18 months to two years. The report has obviously underestimated the presents of Badgers on the Medi Parc site, and in the surrounding areas.

OLD PARK WOOD SSSI and the MEDI PARC

These two areas compliment each other and provide sympathetic habitats for all manner or creatures; the thick undergrowth, ancient tree protection and readily available water in OPW, and the open chalky dryer area of the Medi Parc, is suitable for species such as snakes to sun themselves and provides other species with grasses and plants to eat. The Ecology Report states, Quote:- *"The on-site woodland is considered to be a valuable additional habitat for the assemblage of ancient woodland insects that occur in the adjacent Old Parc Wood"* _eco report appendix 8.2. Page 14/34.

See attached photocopy of relevant page

Appendix 24

Old Park Wood is on the western side of the Medi Parc the belt of trees referred to above on the eastern side of the Medi Parc separated by the open land of the Medi Parc, therefore the whole site is of value not just the woods, and not just for insects.

SITE MANAGEMENT

In March 2010 Natural England wrote to Robert Sheppard (Comer Homes, the owners) telling him not to disturb the brush piles on the Medi Parc because of the possible presents of nesting birds and other

wildlife - two days later the owners burned the piles to the ground.

See attached photocopies of relevant pages

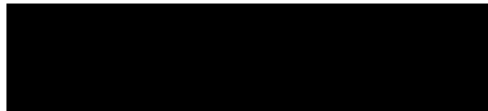
Appendix 26 -28

The owners 'management' of the site, regularly cutting the grass and raking with a forage harvester, as mentioned no fewer than 4 times in the Ecology Report - Habitat and Flora section, does nothing for the protection of the wildlife. These species would have more of a chance of survival if the grass cutting, raking and chemical spraying could be stopped, So many of the species inhabiting the Site are supposed to be protected by Law, however, it appears as if the owners, even if they know that these creatures exist, are able to continue killing them. One could be excused for thinking that the current owners are deliberately trying to eradicate any species from the Site in the hope of an easy route to development.

Attached photographs of grass cutting and spraying

Appendix 29 - 33

For the Medi Parc site to house such a variety of rare species as it does, plus the fact that the Pyramidal Orchids have been seen growing this year, shows the robust nature of this Site. The Medi Parc site is in our opinion and area worth protecting.



for The Harefield Tenants and Residents Association.
29th October 2014

FOR WORK JUN 23
2004

PLOT OF LAND BEHIND HAREFIELD HOSPITAL,
ADJOINING OLD PARK WOOD

RE: MEETING WITH JULIE BROWNBRIDGE

10.00 THURSDAY 22 NOVEMBER 2001

The Site: Undisturbed chalk grassland, which is very scarce in the area of Hillingdon.

As there has been no disturbance of this site, no spraying and no cutting, different plant species have developed naturally over the past few years, and are still developing.

Dwarf Gorse grows on the site. The only other site in Hillingdon where it can be found is at Poors Field, near Ruiship Lido.

Other unusual plants which grow on the site:

Broomrape, Bee Orchid (very widely spread), White Pyramidal Orchid (discovered July 2000), Grass Vetchling,

There are large areas of Bird's-foot Trefoil and as this is the foodplant of the caterpillar of the Common Blue butterfly, this insect is widespread on the site. Another butterfly which breeds here and is unusual in Hillingdon is the Marbled White. The fine grasses on which the caterpillar of this butterfly feeds are plentiful here.

Garden escapes have been found on the site, among them: Pink Columbine, Bladder Senna, Golden Chain, Everlasting Pea, Hollyhock, Canterbury Bell.

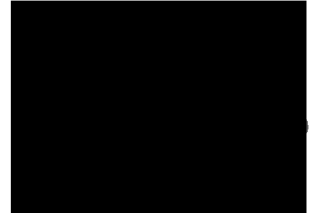
Suggestion: To extend the boundaries of Old Park Wood so as to contain this site.



COPY FOR INFO

2

GREATER LONDON AUTHORITY
Policy and Partnerships



Mr Colin Roome
Conservation and Development Officer
L B Hillingdon Environmental Services Dept
(Park and Open Spaces)
Civic Centre
Uxbridge
Middx UB8 1UW

Our ref: M010
Your ref: 3480/CWR
Date: 8 July 2002

Dear Colin

Medipark Site by Old Park Wood

Thank you for sending me the information and maps of the above site earlier this year. Thanks to Susan's timely reminder, we were able to visit the site last week while the bee orchids were in full flower. We also noted the dwarf gorse, lesser broomrape and colony of marbled white butterfly.

After some discussion, we have concluded that we should recommend the whole site to L B Hillingdon as a Site of Borough (Grade 1) Importance for Nature Conservation (rather than adding the bee orchid area (and site of demolished buildings) to the Old Park Wood Met Site.

My colleague Mike Waite will be making the formal recommendation and citation to L B Hillingdon in due course. Meanwhile, I thought I had better let you and Susan know what is happening.

Yours sincerely

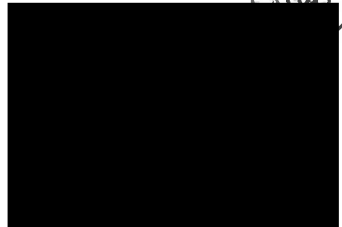
Julie Brownbridge
Senior Biodiversity Adviser

CC: Susan Coldwell

HELLO SUSAN, IT WAS GREAT TO SEE ALL THOSE ORCHIDS (THO' MISSED THE WHITE PYRAMIDAL!) - HOPE YOU'RE HAPPY WITH THE RESULT ... BORO GRADE I IS GOOD.



1.00 Monday
photographs
3(2)



Janet Rangeley
Planning Services
L.B. Hillingdon
Civic Centre
Uxbridge
Middlesex UB8 1UW

Our ref: HiB15
Your ref:
Date: 29 July 2003

Dear Janet,

Medipark Site, Hill End Road, Harefield

As I expect you are aware, the GLA biodiversity team was asked last year by your colleague Colin Roome to evaluate the Medipark Site adjacent to Old Park Wood as a possible Site of Importance for Nature Conservation (SINC). Following site visits by my colleagues Mike Waite and Julie Brownbridge, we have assessed the site against the criteria for identifying nature conservation sites in London, as published in Appendix 1 of the Mayor's Biodiversity Strategy.

Our conclusion is that the site meets the criteria for identification as a Site of Borough Grade I Importance for Nature Conservation. I enclose a copy of the citation, which shows a map of the recommended boundary and gives the reasons why the site is important. We recommend that you consider adding the site to those protected for nature conservation in your forthcoming UDP review.

Note that we have only taken biodiversity issues into account in recommending the site as a SINC. The recommendation is an officer view, in line with policies in the Mayor's Biodiversity Strategy. It does not constitute a formal response to the UDP review under the Town and Country Planning (Mayor of London) Order 2000. Comments are restricted to biodiversity issues, and in no way prejudice any other comments the Mayor or the Authority may make on other issues.

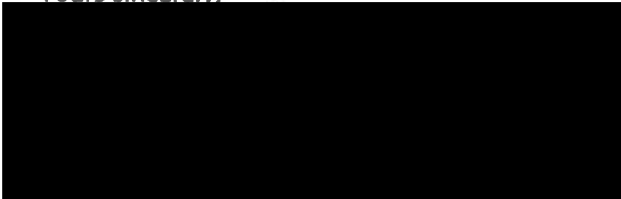
I am sure there will be economic and social factors which the Council will wish to consider in making a decision. In particular, I note that the site was previously included in a schedule of Strategic Employment Sites, published by the former London Planning Advisory Committee (now absorbed into the GLA), although it does not appear on the map or list of Strategic Employment Locations in the draft London Plan.



With regard to the UDP review, may I also take the opportunity to remind you that the current adopted UDP omits numerous recommendations for changes to SINCs made by the former London Ecology Unit, following a resurvey and partial review commissioned by your former colleague Colin Eastman in 1994. My understanding was that these recommendations arrived too late for the first UDP, but would be incorporated in a review. If you have not already done so, I suggest you may wish to consider including these changes in the current review. I would be happy to discuss this further if you wish, and assist in any way I can.

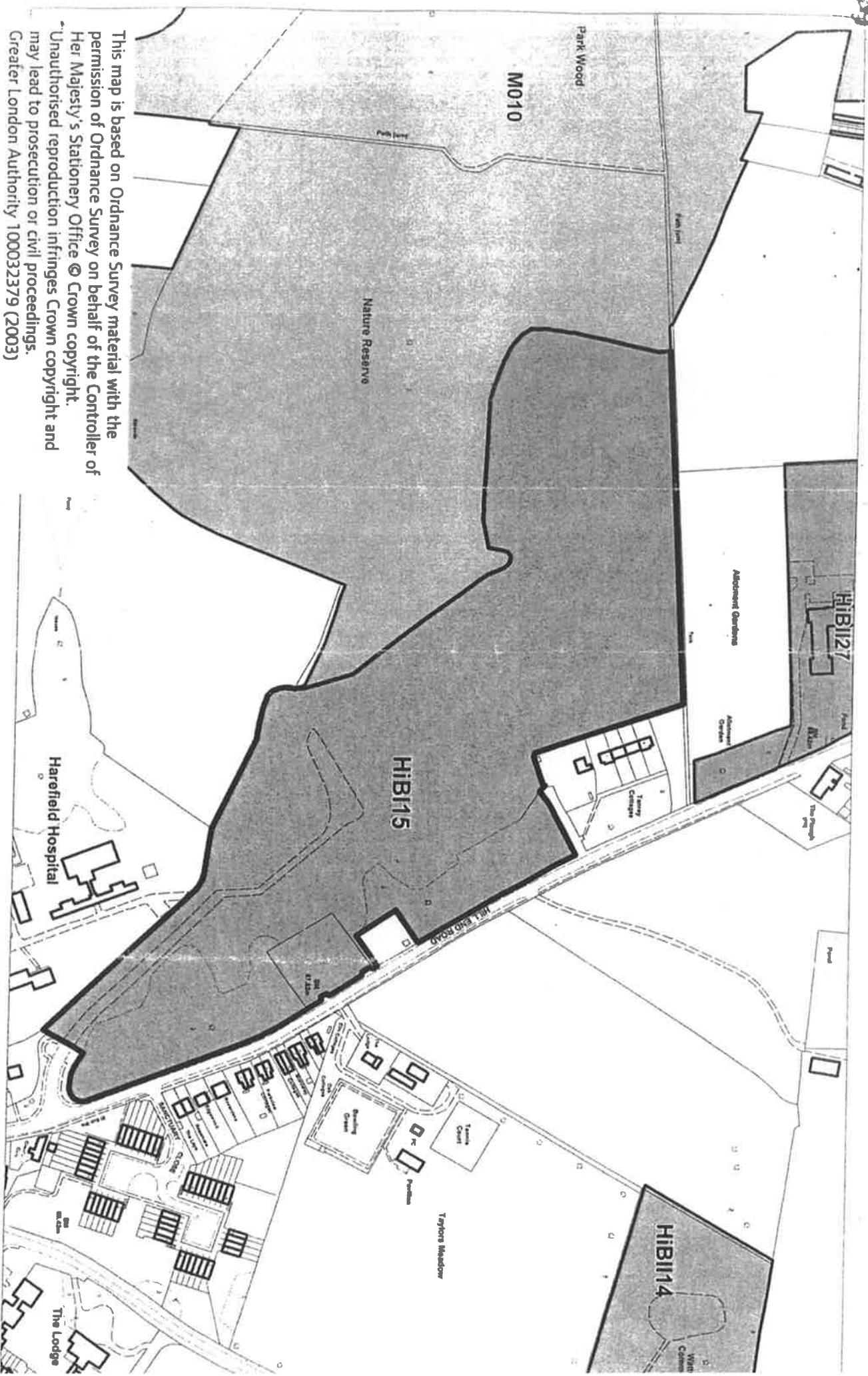
If you want to discuss the Medipark site, please contact my colleague Mike Waite (direct line )

Yours sincerely,



John Archer
Principal Policy Adviser (Biodiversity)

c.c. Colin Roome, Conservation & Development Officer, LB Hillingdon Parks
Susan Coldwell



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Greater London Authority 100032379 (2003)

Site of Importance for Nature Conservation

HiBI15 **Medipark Site**

Grid ref: TQ 050 912

Area (ha): 8

Borough(s): Hillingdon

Site first notified: 08/07/2002 **Boundary last changed:** 29/07/2003

Citation last edited: 29/07/2003

Habitat: **Neutral and calcareous grassland, secondary woodland, ruderal habitats**

An interesting mosaic of habitats developed within the former grounds of a demolished hospital building, including species-rich neutral to calcareous grassland, scrub and some marginal secondary woodland. The best of the grassland supports a sizeable population of bee orchid (*Ophrys apifera*), as well as occasional pyramidal orchid (*Anacamptis pyramidalis*), common broomrape (*Orobanche minor*), glaucous sedge (*Carex flacca*), grass vetchling (*Lathyrus nissolia*) and dwarf gorse (*Ulex minor*), all regionally restricted plants of local distribution within the borough. The secondary woodland consists mainly of oak (*Quercus robur*) with some beech (*Fagus sylvatica*) and common hawthorn (*Crataegus monogyna*), and a ground flora of bramble (*Rubus fruticosus*) and bluebell (*Hyacinthides non-scripta*). The invertebrate fauna is likely to be of interest and includes both marbled white and common blue butterflies, as well as the nationally scarce Roesel's bush-cricket (*Metriopectera roeselii*).

Open Spaces Dept
London Borough of Hillingdon
Civic Centre
High Street
Uxbridge
UB8 1UW

23 June 2008

Dear Sirs

Re: Medipark Site, adjoining Old Park Wood, Hill End Road, close to Harefield Hospital

On 8 July 2002, Julie Brownbridge, Senior Biodiversity Advisor to the GLA, recommended to Hillingdon Council that the above site should be given **A Site of Borough (Grade 1) Importance for Nature Conservation.**

There have been no notice boards put up giving the information that this site is a Nature Reserve. Could this be because the site is privately owned by Koma Homes who are looking to build 80 flats? If the site is privately owned, does this mean you will not recognise this area as a Nature Reserve?

I stress that this site is of national importance, as dwarf gorse grows here and the only other place it is found in the Borough of Hillingdon is Poors Field. Also, the area is rich in bee orchids, a rare white pyramidal orchid, common spotted orchids and lesser broomrape. There is also a colony of marbled white butterflies and common blues. As to reptiles, I have had reports from people that there are grass snakes, smooth snakes and adders.

As you can imagine, if this site was built upon, giving how close it is to Old Park Wood, not only would we lose this meadow habitat with its diverse plants and animals, but the closeness of any housing would bring the possibility of vandalism and damage to Old Park Wood which adjoins the site.

I would welcome your comments on this very important matter. If you wish for a copy of the letter dated 8 July 2002 from Julie Brownbridge of the GLA, I would be happy to send you one.

Yours faithfully

Mrs S Coldwell





To: Mr I Thynne, Principal Sustainability Officer, London Boro' of Hillingdon

9 September 2014 (Reprinted 24 Sept 2014)

Dear Ian

RE: THE MEDIPARK SITE AT HAREFIELD HOSPITAL, HILLEND ROAD

Thank you for speaking to me this morning on the above. Basically, I surveyed the site for a number of years. On the advice of Colin Roome, Environmental Services (now retired) I requested botanists from the GLA to assess the Medipark in July 2003. After their visit they recommended to the Council that in view of the specialist plants found, it should be classed as a Site of Borough Grade 1 Importance for Nature Conservation.

If the site was protected and the fences taken down, different species could move freely from one area to another. In addition, the idea of a large conservation site in Harefield, accessible to the villagers, was a very exciting prospect. I envisaged conservation groups visiting, school groups roaming the area for plant identification, and walks and talks on the importance of the area.

Let me list for you some of the specialist species that were present on the site:

Orchids : Bee orchids (over the whole area)

Common Spotted orchid

Early purples on the edge of the wood

Rare white pyramidal orchid

Dwarf Gorse (the only other site in Hillingdon for this plant is Poors Field)

Lesser Broomrape

Grass Vetchling

Birdsfoot Trefoil (a foodplant for the Common Blue butterfly)

A colony of marbled white butterflies to the south of the site

Slow worms, grass snakes and possibly adders

Yellow meadow ants which only thrive on undisturbed pasture

In 2012/2013 a Great Crested Newt was found

This year I ventured onto the Medipark and discovered a new colony of pink pyramidal orchids (8 in total) I was thrilled. Sadly, the bee orchids do not seem to have yet recolonised, although I was unable to search the whole site.

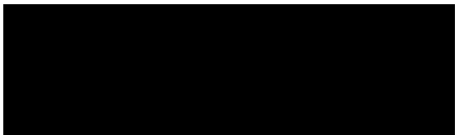
This area is unique in the borough, and it is important that it be preserved. It can be as prolific in species as before, if left. My friends Tina and Peter Wane, who live in 1 Tanrey Cottages, have been very active in trying to save it. It might be worth speaking to them because their house adjoins the Medipark, although they do not have the specialist knowledge of the plants which were in existence in the area..

If you want further information from me, or would like me to speak on the importance of the site, please do not hesitate to call. I will do everything I can to protect this wonderful and unique habitat for future generations.

Sincerely

Sue Coldwell

76



To: Mr I Thynne, Principal Sustainability Officer, London Boro' of Hillingdon

28 September 2014

Dear Ian

RE: THE MEDIPARK SITE AT HAREFIELD HOSPITAL, HILLEN ROAD

Just an update on the above:

23 June 2014 - Quick Study of Site.

New colony of 8 Pyramidal Orchids
Lesser Broomrape
Birdsfoot Trefoil
Oxeye Daisies

Marbled White butterflies
Common Blue butterflies
Japanese Knotweed (spreading into area of lower meadow)

More Detailed Study on Friday 26 September

White Dead Nettle, Dandelion, Common Nettle, Smooth/Prickly Sow Thistle
Hedgerow Cranesbill, Dock, Common Ragwort, Hogweed, Red/White Clover, Ribwort
Plantain, Mouse Ear, Goatsbeard, Common Daisy, Prickly Lettuce, Perforated St Johns Wort,
Yarrow, Common Knapweed, Black Medick, Lady's Bedstraw, Birdsfoot Trefoil, Ground
Ivy, Common Cats Ear, Pineapple Weed, Spear Thistle, Musk/Common Mallow, Creeping
Buttercup, Meadow Buttercup, Oxeye Daisy, Sun Spurge, Ivy leaved Speedwell (Heath
Speedwell has been found on site previously) Gorse. Japanese Knotweed

Some of the above were still in flower. Others I identified from their leaves. In June I was specifically looking for orchids.

By the way, I was informed that someone had been down in September to study the area but found nothing of interest! Of course not. The time to see the plants is June/July time.

I hope this helps the cause.

Yours sincerely

Sue Coldwell

7a

2007



Friends of Colne Valley Park Newsletter

Autumn edition



338

Dear Friends,

Welcome to this autumn's newsletter. We have had a series of walks these last few months which are reported here. I wish to thank very much Ann Hancox, Sue Coldwell and Janet Symes for leading them.

At the end of July, the Colne Valley Festival drew crowds of over 1600, and Louise Morris is to be congratulated for its organisation. Our tombola stall did well at the entrance to the visitor centre. We took £235, which was our highest total ever. Our application to Heathrow Environment and Community Awards scheme enabled this festival to go ahead. It was a free event to visitors.

At half-term, Halloween work shops for children proved popular. They were planned and run by Amy Potter, the new Groundwork "V" volunteer; working on a six month government work experience scheme.

Our Fungus Foray was at the end of that week, in a damp but colourful Bayhurst Wood, on the border of Harefield and Ruislip.

Our Orienteering courses are nearly up and running in Denham Country Park. The Explorers course for the under tens has been available for three months at 20pence a map from the visitor centre. It is similar to the old Coots Trail. The Adventurers senior course which uses compasses (to hire for a deposit of £5) will soon be available. The map is again 20 pence to buy. Janet Symes and I have worked tirelessly on this project for seventeen months to make it available for school parties and the general public.

I wish to thank all members who took part in the August members' questionnaire survey. We had a 35 % response. Janet Symes and I analysed the results and they were reported at our AGM. The committee will act upon some of your comments.

At our AGM in October, we celebrated my tenth anniversary as chairperson, with a lovely Shaun Baker cream and green iced cake. During proceedings I announced my retirement from the post and welcomed Richard Nokes, our Wednesday visitor centre volunteer, who was elected as the new chairman. Ron Collett, our vice-chairman and membership secretary, gave a speech thanking me for my dedication and enthusiasm in this leadership role. He presented me with two memorable photographs of my time on the committee (14 years). I was elected as your new president, so I will continue to give support and advice when needed. I wish our community group and Richard all the best in the coming months.

Yours sincerely,

[Redacted signature]

(Outgoing editor and chairperson)



7c

the walk to the end and also enquiring as to when the next walk would be held. Yet another successful Colne Valley walk – 6 miles in hot sun and they still wanted more!!

Ann Hancox

Old Park Wood and the Medipark site Walk

Sunday 28 June 2009

Thirteen of us met outside Harefield hospital, many of whom had been on the Fulmer to Stoke Poges walk. We entered the Medipark site which, through my efforts, is now a Group 1 conservation area. The butterflies we noted were: meadow browns, marbled whites, a painted lady, burnet moths, skippers and a few blues. This year has not been good for blues, and I was disappointed that we had not seen as many as in previous years. Their food plant, birdsfoot trefoil is abundant in this area. On a previous visit I saw a brown argus butterfly, but this has to be confirmed.

The dwarf gorse had finished flowering but we saw everlasting sweet pea, a garden escape and the spreading and now invasive Japanese Knotweed. There was also downy woundwort, Lady's Bedstraw, black horehound and perforate St John's Wort. We also found a spider's nursery, where baby spiders were gathering in a web, attached to grass stems. Black ants were abundant, but I was unable to locate my previous yellow meadow ant site which had been overgrown. Grass snakes have been seen in the meadow and there has also been a possible sighting of common lizards.

The rare white pyramidal orchid was not found in its usual place, but we discovered five bee orchids. As the site had been devastated by fire a few years ago, the orchids will take some time to recolonise the site. We then walked through Old Park Wood looking for twayblades. We did not discover any, but we saw enchanters' nightshade and yellow pimpernel.

Sue Coldwell



Horn Hill Walk

Sunday 12 July 2009

"If your legs get attacked by stinging nettles – I hope you don't expect me to kiss them better - our First Aid training has its limitations and that goes way beyond it" was the considered medical advice proffered to Jasper during the pre-walk briefing on observing his walking shorts. With other hazards considered we set off from Cheena Meadow car park under dark clouds threatening rain with Neil who offered to be back-marker.



FRIENDS OF THE COLNE VALLEY PARK AUTUMN NEWSLETTER 2005

Dear Friends,

Welcome to our latest newsletter. I wish to thank members for continuing to support our Work for the Colne Valley Park which is celebrating its 40th Anniversary this year. You have come to talks, joined in with guided walks and the family fun event, and given direct donations to projects.

We now have a growing membership of 91 People composed of 68 paid-up members including 4 children, 2 Life members and 21 volunteers. This is our largest total ever since the association began in June 1996.

A great thank you from me to those members who kindly gave a number of very nice gifts towards our tombola stall, patiently and enthusiastically manned by Diana Hogg and her grandson Jake, on both days of the Water & Wildlife Family fun event at the end of July.

There follows a number of articles to keep you in touch with recent events held in the park. I hope you find them interesting to read.

Best wishes,

Liz Pinfold,

Chairperson of the Friends and Editor.

ORCHID WALK SAT. JUNE 11

The walk at the Medipark site by Harefield Hospital took place on a sunny afternoon with a small group of keen botanists and photographers. The previous weeks had been colder than usual, but in spite of this, we were able to see orchids on one of the paths

leading to an area where there were approximately 30 growing under a small tree. These were not yet in flower, but we found more orchids growing nearby. The common spotted orchid I had seen two years ago has unfortunately not reappeared.

We walked onto the main area of the site and I pointed out dwarf gorse. The only other site in Hillingdon where it grows is Poors Field in Ruislip. Adders and grass snakes have been seen here, and I am sure that slow worms must also be present, as the site is warm, sheltered and dry. In July there is a colony of marbled white butterflies and clouds of common blue butterflies are here in late June, as birdsfoot trefoil, the foodplant for the caterpillar of this butterfly, covers the ground with gold flowers.

There are also garden escapes: Canterbury bells, everlasting sweet peas, hollyhocks and one scarlet rosebush. Unfortunately, there is also Japanese Knotweed growing by one of the paths, but I have been told that Herts & Middlesex Wildlife Trust may spray it with a special herbicide as they do not want this pest to creep into Old Park Wood. I pointed out that this site does need some sort of management, as brambles are becoming a nuisance and small oak saplings are growing in the upper area of the site.

We were too early to see the rare white pyramidal orchid, but I paid another visit two weeks later and it was in flower. Liz Pinfold spotted the heath speedwell, which was a first sighting of this plant and has been added to my list, but we could not find broomrape which has been recorded here.

Wednesday 1st 7:00 p.m.
 Broadwater Lake for roosting birds.
Meet in the birdwatchers' car park off Moorhall Road Harefield.
 OS176 Grid Ref TQ048891
 Leader Alan Rix 01895 466804



Sunday 5th 2:00 p.m.
Harefield Place Nature Reserve
 The Nature Trails round the woods.
 Come and see what the Greyhags do and enjoy the varied wildlife around.
Meet at the Golf Course car park at
 OS176 Grid Ref TQ 062864
 Leaders Ann and Alan Rix 01895 466804

Sunday 26th
Day at Pagham Harbour and Selsey Bill, Sussex
 Pagham Harbour is a National Nature Reserve to preserve and protect salt marsh habitat with all its ensuing wildlife and is the only south coast harbour where boats of any type are not permitted!
 At this time all the usual waders should be present including avocet, black tailed godwit, grey plover, little egret, etc.

After scanning the Ferry pool from the hide and viewing the harbour move on by car to St Wilfred's Chapel, Church Norton dated 1300 ish, to another hide overlooking the saltmarsh, then picnic on the beach. On to the car park at Selsey Bill for an hour or so Sea Watching.

Meeting point is the reserve centre car park off the B2145 road from Chichester to Selsey at Sidlesham.
 OS Sheet 197 Grid ref SZ965856.
 Leader John Schmidt 020 8561 6377

2/6

Phone Judy Cross (01895 631015) or Ann Rix (01895 466804) to confirm.

The Greyhags meet most Thursday mornings at the Batching Plant to do conservation work at Harefield Place Nature Reserve.

Summer tasks include clearing paths, keeping the bird feeders full, watching the birds empty them, and generally tidying up.

The work is done in a relaxed but controlled way, and you can do as much or as little as you feel capable of. If you are free, do come along and see what we do.



Jim 'The Strim' path clearing

SUBSCRIPTIONS FOR 2003

Subscriptions for 2004 are as follows:

Subscription rates:	Individual	£6.00
	Family	£7.50
	Unwaged	£3.00

Please send your cheque, payable to Hillingdon Natural History Society to:
 Mrs Ann Rix, Membership Secretary HNHS,
 31 Norfolk Road, Uxbridge, Middx, UB8 1BL.



**HILLINGDON
 NATURAL
 HISTORY SOCIETY**

**April to
 September 2004**



**Cinnabar Moth Caterpillars
 at the Lizzards**

Please note that the start time of events should be obtained by telephoning the leader. If there are no takers the event may be cancelled.

It may also be possible to arrange a lift at that time if you need one.

If the start time is published the event *will* take place.

**Programme Secretary
 Alan Rix**

31 Norfolk Road Uxbridge
 Middlesex UB8 1BL

The Programme

Handwritten initials or mark.

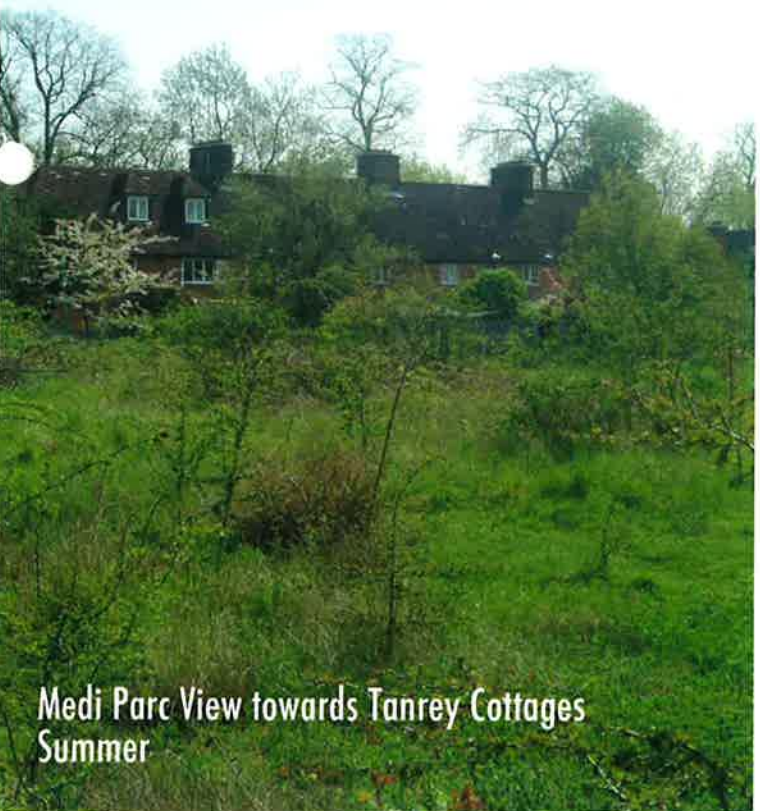
Before Comer Homes clearance of Medi Parc Site



Medi Parc View towards Tanrey Cottages Winter



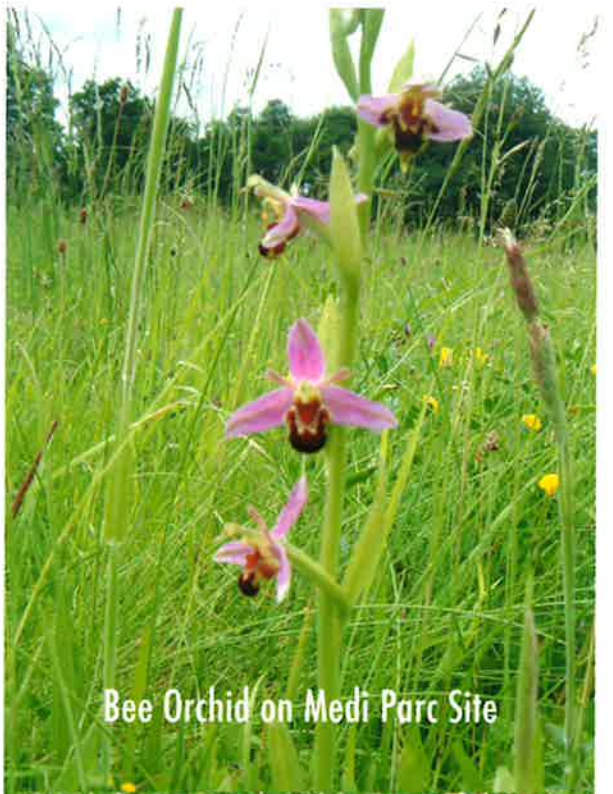
Medi Parc - one of the various paths into Old Park Wood from the site



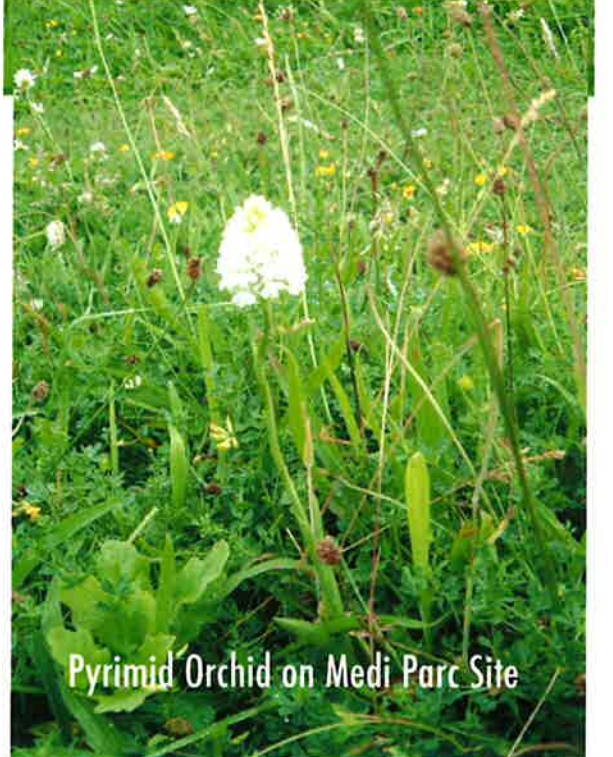
Medi Parc View towards Tanrey Cottages Summer



Slow worm againstst Sainsbury Bag on Medi Parc Site



Bee Orchid on Medi Parc Site



Pyrimid Orchid on Medi Parc Site



Medi Parc during clearance work by Comer Homes



EXECUTIVE SUMMARY

Desk based research and a detailed botanical survey was carried out for a large brownfield site, adjacent to Harefield Hospital, located at land off Hill End Road, Harefield, Middlesex, over the summer of 2013. Habitats on site were mapped, and distinct vegetation communities and sub-communities were identified and surveyed according to the National Vegetation Classification (NVC) methodology.

Immediately prior to the planned survey the grassland areas had been cut and vegetative material shredded (a forage harvester had been used), which rendered accurate grassland community and sub-community identification difficult. Nevertheless, a NVC survey was completed over the site, albeit significantly constrained with regard to community / sub-community identification and the gathering of full species for the grassland habitats. To ensure accuracy of the site's botanical evaluation a second NVC survey was agreed and planned to occur one month later. Unfortunately on the day of that survey the grassland areas had once again been cut with a forage harvester.

The detailed botanical surveys undertaken over this site in 2013 were accurate with regard to woodland, tall ruderal and ephemeral / short perennial habitat, but the grassland could not be recorded to a satisfactory degree and so a repeat NVC survey of this habitat is recommended for the 2014 survey season.

The present botanical surveys demonstrated that the woodland habitat on site is a W10e *Quercus robur*-*Pteridium aquilinum* woodland *Acer pseudoplatanus*-*Oxalis acetosella* sub-community, which is common over acidic substrates across much of southern England. No plant species of note were recorded here.

The grasslands were mesotrophic and predominantly semi-improved neutral grassland of both the M06b *Lolium perenne*-*Cynosurus cristatus* grassland *Anthoxanthum odoratum* sub-community and the MG1e *Arrhenatherum elatius* grassland *Centaurea nigra* sub-community. More species-poor swards were present in the south and north-west of the site where MG1a *Arrhenatherum elatius* grassland *Festuca rubra* sub-community (in the south) and MG1b *Arrhenatherum elatius* grassland *Urtica dioica* sub-community (in the north-west) are present.

The tall ruderal habitat scattered across the site was an OV24b *Urtica dioica*-*Galium aparine* community *Arrhenatherum elatius* -*Rubus fruticosus* agg. sub-community, whilst a band of tall ruderal associated with scattered shrubs along the northern boundary was closest to the OV25b *Urtica dioica*-*Cirsium arvense* community *Rumex obtusifolius*-*Artemisia vulgaris* sub-community. Neither of these communities is of any particular nature conservation interest.

The ephemeral / short perennial habitat recorded across the site was an OV23d *Lolium perenne*-*Dactylis glomerata* community *Arrhenatherum elatius*-*Medicago lupulina* sub-community. No species of note were recorded here.

recorded here. This habitat was a relatively good approximation to the OV23d *Lalium perenne-Dactylis glomerata* community *Arrhenatherum elatius-Medicago lupulina* sub-community.

3.4 FLORA AND FUNGI

3.4.1 On-Site

No desk-study records of notable flora were obtained for the Site itself.

Field surveys did not identify the presence of any protected or notable plant species.

3.4.2 Wider Area

Two London Biodiversity Action Plan species were identified within the 1km search area.

Table 3.4: London and National BAP species of plants and fungi within 1km of the Site

Taxon Name	Common Name	Protected Status	Distance (m)	Bearing	Date
<i>Podoscypha multizonata</i>	Zoned Rosette (a fungus)	BAP Priority London BAP Priority National (SPI)	252	SW	27/05/2004
<i>Oenanthe fluviatilis</i>	River Waterdropwort	BAP Priority London	956	W	01/01/1984

3.5 INVERTEBRATES

The Site has potential interest for invertebrates mainly in relation to the woodland belt in the south. Deadwood habitats such as often associated with veteran trees are often home to uncommon invertebrates.

3.5.1 On-Site

The survey identified 276 species of invertebrate including representatives of the following groups: woodlice, spiders, harvestmen, mites, millipedes, two-tailed bristletails, dragonflies, earwigs, bush-crickets, grasshoppers, treehoppers, bugs, beetles, gall-wasps, ants, bees, scorpion-flies, flies, moths, butterflies, slugs and snails.

One 'Species of Principal Importance' (SPI) the Cinnabar moth *Tyria jacobaeae* was identified during field surveys. When listed on the UK Biodiversity Action Plan (BAP) (now superseded by Section 41 of the NERC Act), this species was listed as a "research-only" BAP species, being still widespread and common, although thought to be declining. Conservation action for "research only" BAP species was focused on further research rather than protection of individual sites.

Amongst the 276 species recorded during the survey, 10 species are regarded as Key Species (using the criteria defined in Appendix 8.2 Annex 1). These 10 species comprise 3.6% of the total species list of 276, and are listed in Table 3.5 below.

Table 3.5: The Key Species recorded during this survey. The table is ordered by conservation status category starting with the rarest/most threatened species (see Appendix 8.2 for definitions of conservation status).

Order	Family	Species (scientific name)	Species (English name)	Conservation Status
→ Diptera	Syrphidae	<i>Rhingia rostrata</i>	Hoverfly sp.	RDB3
Coleoptera	Rhynchitidae	<i>Lasiorhynchites olivaceus</i>	Weevil sp.	Nationally Scarce (Na)
Hymenoptera: Aculeata	Formicidae	<i>Lasius brunneus</i>	Brown Tree Ant	Nationally Scarce (Na)
→ Orthoptera	Tettigoniidae	<i>Metrioptera roeselii</i>	Roesel's Bush-cricket	Nationally Scarce (Nb)
Hemiptera: Heteroptera	Miridae	<i>Dichroscytus gustavi</i>	Mirid bug sp.	Nationally Scarce (Nb)
Coleoptera	Anobiidae	<i>Hedobia imperialis</i>	Beetle sp.	Nationally Scarce (Nb)
Coleoptera	Mycetophagidae	<i>Mycetophagus piceus</i>	Beetle sp.	Nationally Scarce (Nb)
Coleoptera	Oedemeridae	<i>Ischnomera cyanea</i>	Beetle sp.	Nationally Scarce (Nb)
Coleoptera	Pyrochroidae	<i>Pyrochroa coccinea</i>	Black-headed Cardinal Beetle	Nationally Scarce (Nb)
Coleoptera	Apionidae	<i>Protapion filirostre</i>	Weevil sp.	Nationally Scarce (Nb)

Seven of these 'Key Species' are entirely associated with woodlands, of which 5 are associated with saproxylic (dead-wood) habitats.

The remaining three species not linked with woodland have the following associations:

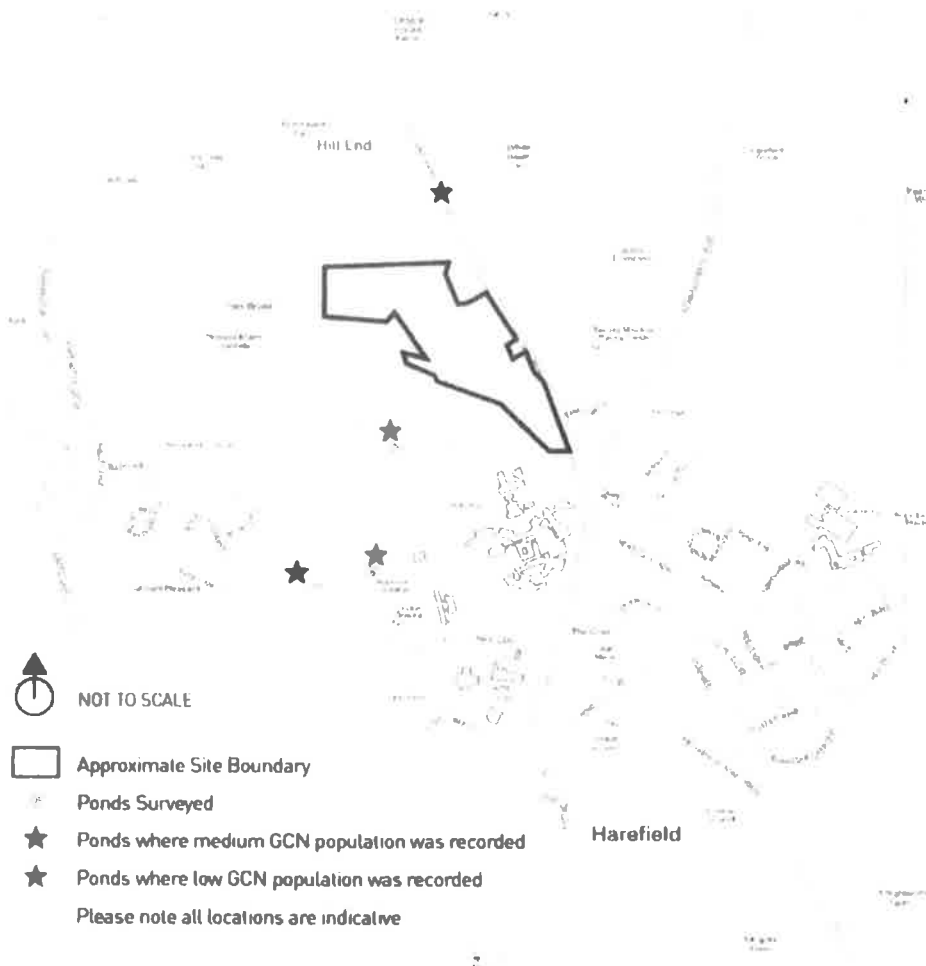
- Roesel's Bush-cricket: a species of coarse grassland;
- the weevil *Protapion filirostre*: a species of short grassland with Black Medick *Medicago lupulina* L.;
- the bug *Dichroscytus gustavi*: on a cultivated cypress.

3.5.2 Wider Area

Desk study revealed one species of note was recorded within a 1km radius:

- Cinnabar Moth *Tyria jacobaeae*, London BAP, 601m west of Site (August 2004)

Figure 3.3: Locations of confirmed Great Crested Newt Presence



3.6.2 Other Amphibians

Protection and Conservation Status

The Common Toad *Bufo bufo* is a species 'of principal importance for the purpose of conserving biodiversity' covered under Section 41 (England) of the NERC Act (2006).

On-Site

No Desk study records of amphibians were obtained for the Site itself.

No suitable amphibian breeding habitat was noted from within the Site.

A single Smooth Newt was identified as an incidental record during reptile survey, on the edge of the woodlands at the north eastern end of the Site.

Only one species in the highest conservation status categories (RDB and Threatened) was found during this survey (Table 3.1), representing 0.4% of the total species assemblage. Normally, the presence of such species is indicative of a site with some importance at national level, however in this case the RDB species concerned, *Rhingia rostrata*, is one that has become more widespread in recent years and no longer merits RDB status (Ball and Morris, 2012).

The results of this survey indicate that the Harefield survey area is of only **Local** importance for invertebrate conservation. The preponderance of saproxylic Key Species can be interpreted as showing that the Site supports an assemblage of woodland insects that have colonised from the adjacent Old Park Wood, particularly since four of the Key Species are noted as occurring mainly (*Mycetophagus piceus*) or frequently (*Rhingia rostrata*, *Ischnomera cyanea* and *Pyrochroa coccinea*) in ancient woodland. The on-Site woodland is considered to be a valuable additional habitat for the assemblage of ancient woodland insects that occur in the adjacent Old Park Wood, although not to the extent of increasing the valuation made above.

4.3 REPTILES

Habitats and features observed on the site during the survey offer potential foraging, refuge and hibernation opportunities to native reptiles. The survey confirmed the presence of one species of common native reptile on the site: Grass Snake. The presence of juveniles, sub-adults and adults indicated that a breeding population is present on, or nearby the site, and utilising habitats throughout. This is considered to represent a breeding population that is of value at the **Local/District** scale.

4.4 AMPHIBIANS

The presence of breeding GCNs in four ponds within 500m of the Site suggests there is the potential for this species to be present in suitable terrestrial habitat on the Site. Areas of suitable habitat on the site are limited to woodlands and the rough tall ruderal/grassland mound along the northern edge of the Site. While grassland habitats can be important foraging habitat for Great Crested Newts, the existing management of the grasslands (regularly mown to a short sward) renders them unsuitable.

It is therefore considered likely that should parts of the site be used as terrestrial habitat by Great Crested Newts, numbers present are likely to be very low.

On the basis that it is possible for parts of the Site to be used by Great Crested Newts, these areas of suitable habitat are on a precautionary basis, assessed to offer potential supporting function to the wider Great Crested Newt population. This wider (off-site) population is considered to represent a number of small to medium sub-populations distributed amongst ponds in the local area. This population is considered to have an ecological value significant at least at the District/Borough scale, and perhaps higher if a part of a larger county/regional meta-population.

4.5 BREEDING BIRDS

The overall breeding bird assemblage on site was evaluated by means of an adapted method described by Fuller (1980), using the guidance described in the IEEM guidelines (IEEM, 2006). Using this approach, importance is defined by the number of breeding species present. A total



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14

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THE



CLOSE UP



Roy and Christine

From: <Ian.Knox@met.police.uk>
To: <royelphick@talktalk.net>
Sent: Wednesday, March 31, 2010 2:25 PM
Attach: Newt back fence.jpg; look what Adam found.jpg; look what Adam found.jpg
Subject: Harefield medi park

Dear Mr Elphick,

I have been contacted by Robert Sheppard, Senior Engineer for Comer Homes. He has requested sight of the photographs of GCNs that you kindly sent me. As they are your photographs I have informed I will need your permission to forward them to him. Do you have any objections to me doing so?

Regards,

Sergeant Ian Knox
Wildlife Crime Unit
Metropolitan Police Service
Wildlife Crime Unit
Met Intelligence Bureau
Indigo Block
Cobalt Square
1 South Lambeth Road
London
SW8 1SU
Tel. 020 7230 (6)8890
Fax. 020 7230 (6)8349
email. Ian.Knox@met.pnn.police.uk

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From: Flint David - MIB On Behalf Of Wildlife - SCD6
Sent: 04 March 2010 10:30
To: Knox Ian - MIB
Subject: Harefield medi park



16c



EXECUTIVE SUMMARY

Following a 'Preliminary Ecological Walkover' of land proposed for development ('the Site') off Hill End Road, Harefield, Biocensus Ltd were commissioned by Biodiversity by Design to undertake surveys of surrounding water bodies for Great Crested Newts (GCN) *Triturus cristatus*.

The surveys were required following the identification of suitable GCN terrestrial habitat on Site, which had the potential to be impacted by development proposals.

GCN surveys were carried out at six water bodies within 500m of the site. The surveys were undertaken between 09 April and the 26 May 2014 by a licensed ecologist following best practice guidance.

The multiple survey visits employed a variety of methods and revealed the presence of GCNs, Smooth Newt *Lissotriton vulgaris* and Common Toad *Bufo bufo* within the study area. The surveys indicated a population size class estimate for GCNs of low - medium for four of the surveyed ponds.

As GCNs were found breeding within 500m of the site, development has the potential to result in adverse impacts on individual newts and the habitats that they may be using. An appropriate mitigation strategy is therefore necessary to accompany the development proposals. It is possible that some of the mitigation works will require a licence from Natural England as GCNs are a European protected species.

Wider Area

Desk Study

No records for other amphibians were obtained from within the search area.

Surveys undertaken identified Smooth Newt to be present in ponds 1, 2, 3B, 4A, 4B.

3.7 REPTILES

3.7.1 Protection and Conservation Status

The species of reptile that could conceivably occur in the area are:

Slow-worm *Anguis fragilis*

Grass Snake *Natrix natrix*

Common Lizard *Zootoca vivipara*

All three are protected against intentional killing or injury under the Wildlife and Countryside Act and all are species 'of principal importance for the purpose of conserving biodiversity' covered under Section 41 (England) of the NERC Act (2006).

3.7.2 On-Site

No desk study records of reptiles were obtained for the site.

Refuge and observation surveys for reptiles recorded Grass Snake to be present in several parts of the survey area. Individuals recorded included juveniles, sub-adults and adults, with a peak count of 3 in any one visit.

No other reptiles were recorded during surveys.

3.8.2 Desk Study

No desk study records of birds were obtained for the Site itself.

GIGL did not hold a comprehensive species list for the area, but did provide records for protected and BAP species. No records were available post 2004 and most data was recorded in the 1990s. Thirteen species were recorded in total, with 3 species recorded in 1km proximity to the area post 2000:

- Sand Martin *Riparia riparia*
- Song Thrush *Turdus philomelos*
- House Sparrow *Passer domesticus*

3.8.3 Field Survey

The survey recorded a total of 54 bird species, including species only seen flying over the survey area. Appendix 8.5 includes comments on the occurrence of each species at the site, including the results of the CBC territory analysis.

- Six species were confirmed as breeding on site with 19 species thought to be probably breeding in the area. Eight species were found to be using the survey area for foraging while either breeding outside the survey area (in Old Park Wood or elsewhere) or possibly within it. 1 species was thought to possibly be breeding on site. The remaining 28 species were neither breeding nor foraging in the survey area.

Seven Species of Principal Importance were recorded: Bullfinch, Herring Gull, Lapwing, Linnet, Marsh Tit, Song Thrush and Starling, six of which are also Red List species (Eaton *et al.* 2009). Of these seven species, Song Thrush was found to be probably breeding on the survey area, Bullfinch was found to be possibly breeding on the survey area, Marsh Tit was found to be foraging on the survey area in a post-breeding flock, and the remainder were not breeding on the survey area.

- *Song Thrush*: Up to three singing birds were recorded on each visit, in or near the survey area. The survey area and adjacent part of Old Park Wood includes all or part of up to five territories.
- *Bullfinch*: The survey area appears to encompass part of a Bullfinch territory, though probably not the core part of the territory containing the nest.
- *Marsh Tit*: Only recorded in post-breeding flocks on the last two visits.

3.9 BATS

3.9.1 Protection and Conservation Status

All bats in the UK enjoy full protection under both the Wildlife and Countryside Act (1981) as amended and the Habitats Regulations (2010) as amended. Additional protection may be considered to be afforded to bats that are 'qualifying interests' of European Special Areas of Protection designated to protect roost and are listed on Annex II of the Habitats Directive (Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora). This is because the law requires that the favourable conservation status of the population for which the SAC was designated must be maintained or restored. This

requirement can be considered to afford indirect protection to any habitat or feature away from such roosts that may be important in maintaining that conservation status. This may include some key foraging and commuting areas. Currently SACs in the UK are designated for the conservation of four relatively vulnerable bat species namely: Greater Horseshoe Bat *Rhinolophus ferrumequinum*, Lesser Horseshoe Bat *Rhinolophus hipposideros*, Bechstein's Bat *Myotis bechsteinii* and the Barbastelle *Barbastellus barbastellus*.

All species of bat occurring in London are listed as Priority Species within the London BAP. These are:

- Brown long-eared bat *Plecotus auritus*
- Common Pipistrelle *Pipistrellus Pipistrellus*
- Daubenton's Bat *Myotis daubentonii*
- Leisler's Bat *Nyctalus leisleri*
- Nathusius's Pipistrelle *Pipistrellus nathusii*
- Serotine *Eptesicus serotinus*
- Soprano Pipistrelle *Pipistrellus pygmaeus*
- Noctule Bat *Nyctalus noctula*
- Natterer's bat *Myotis nattereri*
- Whiskered/Brandts *Myotis mystacinus/brandtii*

None of these species are considered especially rare bats in a UK context, however, those underlined font are considered scarce/rare in a London context.

3.9.2 Wider Area

Desk study records relating to bats (from GIGL and the London Bat Group) between 1996 and 2011 identified 9 species to be present within the search area:

- Daubenton's Bat
- Leisler's Bat ✱
- Noctule Bat
- Common Pipistrelle
- Nathusius's Pipistrelle ✱
- Soprano Pipistrelle
- Long-eared Bat (Probably Brown) Plecotus
- Serotine ✱

Records were also obtained for unidentified Vespertilionidae and Myotis species.

Records of two roosts were obtained, one for an unidentified species and one for a Common Pipistrelle, both in excess of 500m to the south of the Site.

3.9.3 On-Site

Desk Study

No desk study records of bats were obtained for the Site itself.

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Tree Assessments

A total of fifteen trees were identified from ground-based inspection to require further survey for roosting bats. Subsequent climbing inspections and dusk/dawn emergence surveys (where trees not safe to climb and inspect) did not identify any roost to be present.

Transect Surveys

The transect surveys confirmed at least five bat species using the site. These were Common Pipistrelle, Soprano Pipistrelle, Serotina, Noctule and at least one *Myotis* species. Of this latter group, not all could be identified to species, but sonogram analysis confirmed Brandt's to be present.

Table 3.7: Summary of transect results for each survey month.

Month	Combined species records for each month				
	Common Pipistrelle	Soprano Pipistrelle	<u>Serotina</u> *	Noctule	Myotis Sp.
May	9	15	4	0	0
June	15	17	6	0	4
July	13	13	2	1	0
August (Dusk)	25	40	0	2	2
August (Dawn)	9	19	0	2	1
September	9	25	4	4	2
October	1	3	0	0	0

Numbers of Pipistrelle species records peaked during August and then declined into October, whereas numbers of all other species records remained relatively low throughout the survey period.

Common Pipistrelles and Soprano Pipistrelles were encountered most frequently, and across most of the site, with much lower encounter rates for the other species.

Pipistrelle species were concentrated in the south-east of the site, along the woodland close to the entrance gate (which seems to be an important foraging area), and then further along the woodland strip that borders the eastern side of the site. The hedge-line which borders the allotments on the north boundary of the site also appeared to be frequently used for foraging and commuting during much of the 6 month monitoring period. Pipistrelle species were recorded at other locations across the site, but in lower numbers.

Serotines were predominantly recorded along the western boundary of the site, and along the hedge-line on the northern boundary. Noctule were recorded in the western side of the site and often commuted across the centre of the site. *Myotis* species were predominantly recorded along the western and northern boundaries of the site.

The recording system employed by Anabats can only respond to the signal with the highest intensity at any time. As the signal from some bat species (such as Common Pipistrelles) will nearly always be more intense than that of other bat species (such as Myotis bats), it is possible that some bat signals were not recorded. As a result, some bat activity may have been under-recorded.

The height at which Anabats were positioned may have limited the recording of some bat activity across all stations.

The identification of bats in the genus Myotis to species level based on recorded echolocations is not always possible, with a high degree of confidence owing to overlap in call characteristics, together with their range of different calls. Techniques are being developed to assist with the identification of these bats from recordings, such as the use of 'slope' in the Anabook programme designed for use with Anabat CF detectors. Comparison of slope between Myotid and a library of known calls was used to assist with our identification.

No trees were present on the site within its western boundary where it borders Old Park Wood SSSI, and therefore no static recorders could be securely left in this area. Instead static recorders 3 and 4 were respectively located near where this woodland area abuts the site at its east and north corners (see Figure 2.2). To supplement this we also carried out a dusk/dawn survey in August (using two Anabat detectors) along this western boundary of the site with the SSSI.

The static recorder at location S2 failed in June 2013 due to a blown fuse, and hence data was only recorded on the first of this five day period.

A disused badger outlier sett was identified within the woodland during the preliminary site survey in 2011.

Occasional signs of badger activity (single dung-pit and signs of foraging activity) were noted on the site over the two year course of surveys of the Site, all from along the western boundary of the Site with the SSSI.

3.10.2 Hedgehog

Protection and Conservation Status

The Western European Hedgehog is a species 'of principal importance for the purpose of conserving biodiversity' covered under Section 41 (England) of the NERC Act (2006). A report by the British Trust for Ornithology (BTO) commissioned by PTES and the British Hedgehog Preservation Society (BHPS) to determine the state of Britain's hedgehogs, indicates that at a conservative estimate a quarter of the population has been lost in the last ten years.

Wider Area

No desk study records of Hedgehog were obtained for the Wider area.

On-Site

No desk study records of Hedgehog were obtained for the Site itself.

No observations or field signs of Hedgehog were noted during the course of surveys.

3.11 CONSULTATION

3.11.1 Natural England

Detailed consultation with Natural England has been conducted under a Discretionary Advice Service (DAS) contract, as a part of which NE have commented on the following aspects:

- Local area designations and policies through Local Plans and National Planning Policy Area Framework
- Status of designated sites including species and potential for impact of scheme such as hydrology pathway receptors
- Comment and advice on layout plan and design of proposed scheme including height and massing
- Green Infrastructure provision
- Approach and methodology of biological and non-biological surveys and assessment/consideration of results obtained

The full response from Natural England can be found in Appendix 3.

3.11.2 Wildlife Trust

Consultation with the Herts and Middlesex Wildlife Trust (HMWT) has been undertaken, which has involved a number of telephone conversations, correspondence and a site meeting. A key focus of this consultation has been to identify areas where Red and Yellow can work with the Wildlife Trust to deliver and support key ecological management, enhancement and amenity

4.0 DISCUSSION AND VALUATION

4.1.1 Species

A total of 276 species of invertebrate was identified from the Harefield site, which allows a robust and accurate assessment of the importance of the site for invertebrate conservation.

Ten Key Species were found on site (Table 3.1), comprising 3.6% of the total 276 species found during the survey. Based on the surveyors experience in applying similar survey techniques to c. 40 other regionally comparable sites proposed for development (i.e. excluding sites in nature conservation management), this is a low percentage, being lower than the mean of 4.5%.

Only one species in the highest conservation status categories (RDB and Threatened) was found during this survey (Table 3.1), representing 0.4% of the total species assemblage. Normally, the presence of such species is indicative of a site with some importance at national level, however in this case the RDB species concerned, *Rhingia rostrata*, is one that has become more widespread in recent years and no longer merits RDB status (Ball and Morris, 2012).

The results of this survey indicate that the Harefield survey area is of only local importance for invertebrate conservation. However, the woodland at the Harefield site is considered to be a valuable additional habitat for the assemblage of ancient woodland insects that occur in the adjacent Old Park Wood.

4.1.2 Recommendations

Although, taken as a whole, the Harefield survey area is of only local importance for invertebrate conservation, the woodland is valuable as additional habitat for the assemblage of ancient woodland insects that occurs in the adjacent Old Park Wood. In view of this, it is recommended that all or most of the woodland be retained within the proposed development.

From: Dresner, Emily (NE) [REDACTED]
Sent: 16 March 2010 17:32
To: Robert Sheppard
Cc: Brian Comer; Losse, Paul (NE); Cedi, Jane (NE); [REDACTED]
Subject: Medi Parc, Harefield

3806
250

Dear Robert,

Thank you very much for your time and our constructive conversation this afternoon. I thought it useful to briefly summarise what we discussed – please see my third paragraph below for urgent comments with regard to protected species law.

With regard to possible impacts on the adjacent Old Park Wood SSSI it is disappointing that Natural England was not aware of the clearance works taking place at the Medi Parc site, as this would have been an early opportunity to begin a positive dialogue about managing impacts to the site, and to explore possible future enhancements. However I recognise that, as you explained, for operational purposes Comer Homes considered it necessary to clear scrub and woodland from the edge of the site, in order to redefine the boundary with the SSSI and construct fences to secure machinery within the site.

Having said this, I welcome the fact that Comer Homes has responded positively to the suggestion of further discussions about the inclusion of conservation enhancements when the site is redeveloped. This would add to the biodiversity value of the Medi Parc itself as well as contributing to the conservation and enhancement of the adjacent SSSI, which is notified for floristically rich ancient woodland – as you know a very valuable habitat. Natural England always seeks a positive dialogue with developers at an early stage and is keen to work with them, where possible, to secure positive outcomes for the natural environment. You have explained that there is an extant planning permission for the site, although there are likely to be applications for variations to that permission. As you know, due to the site's proximity to the SSSI Natural England would be a statutory consultee should any further planning permissions be required, and in this scenario we would very much like to be in a position to comment positively on such an application. Thank you for your encouraging comments with regard to biodiversity enhancements - I look forward to further discussions with your colleagues when an opportunity arises in the near future.

As we discussed, in the short term my greatest concerns relate to **protected species** on the site, and it is encouraging to hear that you are engaging WSP as your ecological consultants. I have explained that the brush piles currently standing on the site are ideal nesting sites for songbirds such as dunnock, as well as providing ideal refuges for great crested newts and reptiles if these are present on the site. I appreciate that the piles were only left recently, but this unfortunately coincided with the beginning of the breeding season and it is highly likely that birds are beginning to nest in them. If so, dismantling or otherwise destroying the piles would disturb nesting, which is illegal under the Wildlife and Countryside Act 1981 (as amended). Reptiles are protected by the same Act, and great crested newts are protected both the Wildlife and Countryside Act and European legislation, the Habitats Regulations. I would therefore strongly advise that you follow the recommendations given by your ecologist. These will help you ensure that activities on the site remain within the law, and are likely to include implementation of a watching brief, whereby the ecologist is present on site to advise when it is safe to dismantle brush piles. This may actually help you continue work more quickly, as with the ecologist's specialist guidance, you will only need to wait until the young have fledged. The ecologist will also be able to advise you with regard to the presence of protected species including great crested newts, and any mitigation measures that will need to be implemented, in line with the relevant legislation. This may include obtaining a license from Natural England.

~~25/6~~
25/6

In my view, the above would have the additional benefit of reassuring outside observers that Comer Homes are taking their legal duties with regard to nature conservation seriously, given the local reaction you have experienced. In more general terms, I am aware that wider discussions regarding activity at the site have not been as positive as all parties involved would have hoped. Natural England works closely with our partners including conservation site managers and borough councils, and also has a role in managing queries from members of the public; we would therefore be keen to help ensure that the situation is managed as positively as possible. I would also strongly encourage further positive dialogue between Comer Homes and our partners, including Herts and Middlesex Wildlife Trust who have an interest in the biodiversity value of the site; if there is anything I can do to facilitate this, please let me know.

At the end of our conversation I mentioned that Natural England has received press queries regarding protected species on the site. Natural England will respond to media enquiries only within our remit, ie in relation to nature conservation and protected species. Your comments with regard to operational detail will not be repeated in this context, but I understand that any such queries should be referred to Comer Homes as appropriate.

Thank you again for your time this afternoon, and please do not hesitate to contact me if you have any queries about any of the above. I am available all week by phone and email should you need to get in touch.

Best wishes and kind regards,

Emily

Emily Dresner

Land Management and Conservation Specialist

Wild London Team

Natural England



Natural England is here to conserve and enhance the natural environment, for its intrinsic value, the wellbeing and enjoyment of people and the economic prosperity that it brings.

This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Nothing in the email amounts to a legal commitment on our part unless confirmed by a signed communication. Whilst this email and associated attachments will have been checked for known viruses whilst within the Natural England systems, we can accept no responsibility once it has left our systems. Communications on Natural England systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

TAKEN 18/3/2010



TAKEN 18/3/2010

28

18/3/2010

27



18/3/2010

From: "Paul Connor" <PConnor@Hillingdon.Gov.UK>
Subject: **Re: Fwd: Medi Parc**
Date: 19 March 2010 14:30:12 GMT
To: [REDACTED]
Cc: "James Rodger" <JRodger2@Hillingdon.Gov.UK>, "Jaspal Wadhwa" <JWadhwa.PO-3.Pri-Dom@Hillingdon.Gov.UK>

Dear Mr Wane,

I write further to your e-mail below forwarded to me and my telephone conversation with Mrs Wane yesterday.

Following complaints I witnessed the burning yesterday lunchtime amounting to a statutory smoke nuisance, and through speaking to Comer Homes was able to get an undertaking that burning would cease yesterday afternoon.

I understand the fires were still smouldering this morning due to their size, but that disposal of the material will now take place using other methods.

Please let me know if I can be of further assistance.

Yours sincerely,

Paul Connor
Environmental Health Officer
London Borough of Hillingdon - Environmental Protection Unit
Tel: 01895 556874 Fax: 01895 277443
www.hillingdon.gov.uk/pollution

>>> Pete Wane [REDACTED] 18/03/2010 17:10 >>>
Dear All,

Please see the attached photos taken today of the fires created by Comer Homes on the Medi Parc site. Not only has the smoke from these fires been a nuisance to neighbouring properties; not only have wildlife been killed in the process; not only is this site a Grade 1 SINC; not only are these developers making sure that rare species and plants will not survive on this site, but I think you will agree this amount of burning is just down right dangerous.

PS 180185

SPRAYING CHEMICALS INSIDE OLD PAR
WOOD 12/3/14

29





RS 180186

18/5/14

31



P 6060243

6/6/14

32



P6290248

29/6/14

33



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mrs
 First name S.
 Last name Matthews
 Address

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)

Walsingham Planning

Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DMTC2
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The policy requires the retention of 50% of the Secondary Shopping Frontage in Class A1 use when some of the centres do not even have this level of Class A1 frontage at present. This is overly prescriptive and does not conform to the pro-economic development aims of the NPPF.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Include more flexibility in the policy to allow for changes in the commercial market and demand for Class A1 floorspace.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring





Response to Local Plan Part 2 consultation PD8612 Samantha Humphrey

1 message

Tim Miles <[REDACTED]>

17 October 2014 10:53

To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

Dear Sir/Madam,

We have been instructed by our client Aviva Investors to respond to the consultation on the Local Plan Part 2 (Development Management Policies – September 2014).

Aviva Investors are a major land owner and investor in the Borough, owning the Lombardy Retail Park in Hayes.

The proposed Local Plan Proposals Map identifies the Lombardy Retail Park as falling within the Uxbridge Road Town Centre. The land occupied by the Lombardy Retail Park was previously considered to be a Town Centre location in the adopted 1998 Unitary Development Plan.

Aviva Investors supports the continued identification of the Lombardy Retail Park as part of the Uxbridge Road Town Centre. The Retail Park plays an important function in the Town Centre, providing a range of shopping and restaurant facilities including a major Sainsbury's Supermarket which provides a key shopping facility anchoring the town centre.

We note that Draft Policy DMTC1 (Town Centre Developments) and supporting text is unclear in its meaning when read as a whole.

The draft policy states that proposals for main town centre uses in out-of-centre locations will only be permitted where an impact assessment is provided for proposals involving over 200 sq m of gross retail space.

Supporting text paragraph 3.9 also refers to the 200 sq m threshold, however this is somewhat ambiguously worded. Paragraph 3.9 should be amended to state "Council will require an Impact

Assessment for any retail proposal in out-of-centre locations which exceeds 200 sqm gross retail space". This is then consistent with the sentence that follows and the wording of Policy DMTC 1.

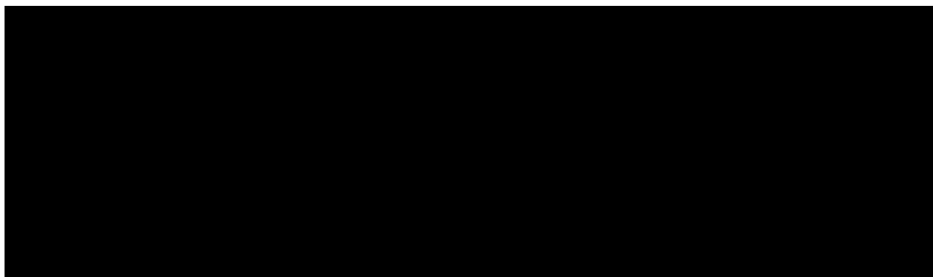
I hope that you find the above helpful, and Aviva Investors will look forward to continue the involvement in the plan making process. I would be very grateful if you could add me to your consultation database, and please contact me if you have any queries.

Thanks and regards,

Tim Miles

Associate

Montagu Evans LLP



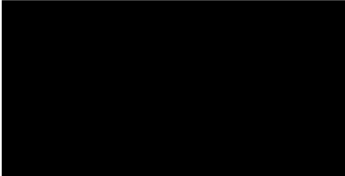
This e-mail is intended solely for the person to whom it is addressed. It may contain confidential or privileged information. If you have received it in error, please notify the sender immediately and destroy the transmission. You must not copy, distribute or take any action in reliance on it.



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Mark
Last name	Stirling
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	6.3 Kings College Playing Fields

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Justification is given for classifying the land as Metropolitan Open Land. However, no justification is provided for removing this land from the UDP designation 'Areas forming links in a Green Chain'. The guidance suggests the two are certainly compatible. Removing the Green Chain classification would reduce the protection afforded to this area and this seems contrary to the council's stated aims. Moreover, this removal of this status is not highlighted elsewhere (e.g. under the heading 'Green Chain Deletion' in the Site Allocation and Designations document) and might therefore be missed by anybody casually reviewing these documents.

Please set out what change(s) you consider necessary Leave the land as part of the Green Chain. i.e. change the

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



ID 14, rep 1



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

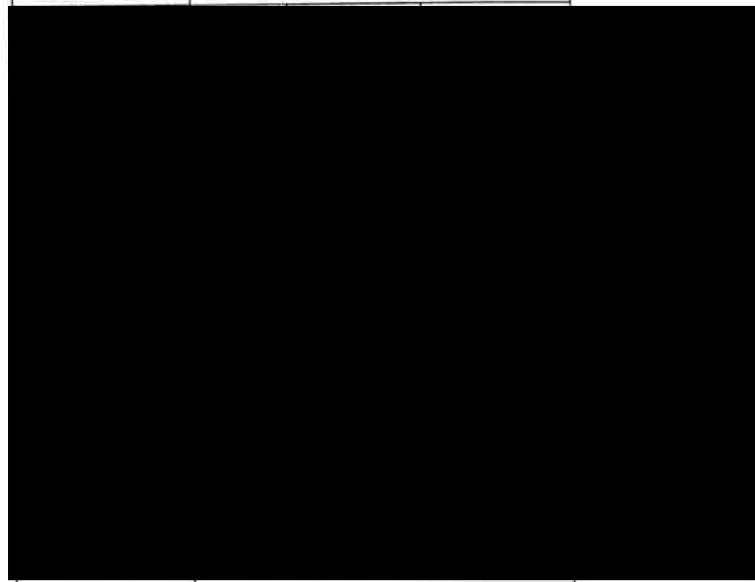
Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	OUTDOOR MEDIA CENTRE		
Unit	House number		
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	MR
First name	CHRIS
Last name	THOMAS
Company	CHRIS THOMAS LTD



PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2		Technical Reports (answer Q1 & Q9 only)	
<input checked="" type="checkbox"/>	Development Management Policies	<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Site Allocations and Designations	<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Policies Map (Atlas of Changes)	<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB14 (C)
Paragraph Number; or	5.52 5.56
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SEE ATTACHED LETTER

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

SEE ATTACHED LETTER

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Chris Thomas Ltd
Outdoor Advertising Consultants



The Planning Policy Team
London Borough of Hillingdon Council
3/N02 Civic Centre
High Street
Uxbridge
Middlesex UB8 1UW

26 September 2014

Dear Sir/Madam,

London Borough of Hillingdon Local Plan Part 2, Development Management Policies Publication Draft, September 2014

These representations are submitted on behalf of the Outdoor Media Centre (OMC – formerly the Outdoor Advertising Association) in response to Policies DMTC5, DMHB14 and supporting text.

The OMC represents 97% of the outdoor advertising industry and monitors development plans throughout the country to ensure that emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

The OMC would firstly point out that, in line with section 3 of the PPG, a local plan does not have to contain advertisement control policies; and that, if such policies are considered necessary to protect the unique character of a particular area, these should be evidence based.

We would point out that Policies DMTC5 and DMHB14 and their respective supporting text are terribly muddled and confusing. Policy DMTC5 states that it gives advice on “Shopfronts”; yet it also gives advice on advertisements. Policy DMHB14 states that it concerns “Streets and Public Realm”; yet it also contains advice on shopfronts and advertisements. Supporting text 5.52 - 5.56 jump around between shopfronts and advertisements with absolutely no cohesive pattern. This is incredibly misleading for readers. Having looked at DMTC5 and found advice on shopfronts and advertisements, why should they also need to look elsewhere (and why would they look at “Streets and Public Realm”)? There is no indication that this policy might be relevant to shopfronts and advertisements.

We suggest that the various relevant parts of these two policies and their supporting text be combined, abbreviated and improved into a single (or two) comprehensive policies concerning "Shopfronts" and "Advertisements".

As to detailed comment:

Para 3.34 correctly identifies that poorly designed and sited shop signs can have an adverse impact on the character of an area. However, this provides no evidential support for Policy DMTC(F). We agree that illumination to shopfronts should avoid light pollution and intrusion to nearby residents. But this does not justify the proposed ban on all flashing and internally illuminated "box lights". Again, each proposal must be considered on merit (and I do not for a second believe that there are no internally illuminated "box lights" displayed on bus shelters in the Borough with the Council's approval).

Para 5.52-5.56. Paras 5.52-53 concern advertisements; 5.54-5.55 concern shopfronts; 5.56 concern advertisements again. These should be re-ordered as we recommend above. As to detail, "advertisement proposals, includingetc" is unnecessary. All are "advertisements" within the statutory definition. Evidence taken from Inspector's Reports at Local Plan Inquiries at Mendip and Wandsworth support our objections. In the Mendip case the Inspector concluded that a similarly restrictive policy being put forward by the Council was not justified. I quote from paragraph 4.182 of the Inspector's Report:

"There is also no need to make special mention of poster hoardings. They clearly fall within the normal meaning of *advertisements* and, whilst they are the subject of specific guidance in the annex to PPG19 (now section 8 of the PPG), they are still subject to the same amenity and public safety tests contained in the Regulations as other outdoor advertising."

In the Wandsworth case the Inspector again dismissed the use of blanket policies that would restrict advertisements of certain types or locations. I quote from paragraph 3.145 below:

"The Regulations limit Council control of those advertisements which fall within their scope to the interests of amenity and public safety. There is, therefore, no support in them for a blanket policy to prevent advertisements near schools and playgrounds....It is clear that all applications should be considered on these two grounds on their own merits. For the same reason I cannot accept objection 319 which would not allow the number of hoarding sites to be increased."

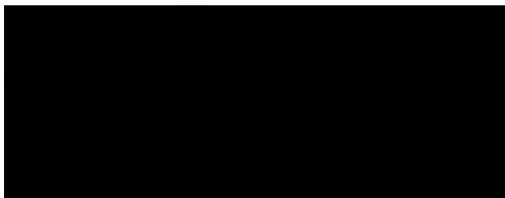
So, whilst we accept that para 5.52 should quite properly draw attention to "proliferation", there is no justification for the proposed restrictions in the remainder of the paragraph. How can free-standing advertisements be judged against a "fascia level" which does not exist? We also agree that high-level signs need to be carefully controlled; but there is no requirement for such signs to "make a positive contribution". The Regulations require that, provided an advertisement does not detract from amenity or public safety, it must be permitted.

Paras 5.53 and 5.56 both concern the same matters, eg heritage assets. They should be combined. The first sentence of paragraph 5.56 correctly identifies the matters to be considered (although "illuminated signs, lettering and" is superfluous - they are all "advertisements"). But this provides no justification for the proposed ban on "fully illuminated" fascia panels and other "signs" on listed buildings or in conservation areas. Many conservation areas (which very often include listed buildings) are thriving commercial areas where the full range of advertising on business premises is to be expected and welcomed, providing it does not detract from amenity. The last two sentences of para 5.56 partly contradict the first part of this paragraph. This means that the advice is confusing (and, again, totally unjustified, for the reasons we give above). For example, individually illuminated letters or "halo" illumination is actually "internal illumination" - it can be no other! Finally, external spotlights must project to cast light onto a background - how are they supposed to be "concealed"?

In Policy DMHB14(C), "and hoardings" is superfluous, as explained above. But, curiously, the remainder of this part of the policy is wholly acceptable and this is what should be reflected in the supporting text.

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Yours faithfully



Chris Thomas
Chris Thomas Ltd

IP15

LDF Team 3N/02,
Residents Services,
Civic Centre,
High Street,
Uxbridge,
UB8 1UW.



17th October 2014

Dear LDF Team,

Thank you for providing an opportunity to comment on the Local Plan 2. I am a Pastor of a local church congregation of 300 members and make these comments in this capacity as well as a local Hillingdon resident.

1. Comment on Section 7.2

- The London Plan (3.86), when defining Social Infrastructure, appears to confidently include the phrase 'Places of Worship'. However, in the Hillingdon Plan (7.2), it is absent from the list. I would like to ensure all reference to 'Community Infrastructure' clearly includes 'Places of Worship' acknowledging the positive contribution faith groups make.

2. Comment on Section 7.15

- This is a very weak statement overall and offers very little in the way of a 'plan'. The Local Plan acknowledges that religious groups form an important part of the infrastructure and in the same breath acknowledges they struggle for facilities- so why then wouldn't there be a very strategic and intentional approach from the Council to do all it can to improve the situation? Can we be more ambitious please?
- '*...to assist wherever possible*' is a very limp commitment and in its essence is no plan at all. It is a commitment to react rather than to proactively identify opportunities.
- '*through its inter-faith forum*'- I have huge admiration for Hillingdon Inter Faith Forum but I am concerned about the primary 'assistance' coming through a volunteer led, 3rd party organisation and not directly from the Council itself. Without a doubt HIFN has a part to play, but to be the exclusive route to the Council on these issues seems restrictive. If the Council is choosing to use HIFN as its primary route of assistance then the relationship between all faith groups and HIFN needs clarifying and the relationship between Hillingdon and HIFN needs detailing and communicating to all faith groups.

3. Comment on Section 7.16

- The issues raised here, on the whole, only exist because there is no proactive plan in 7.15. The answer to the problem in 7.16 is simply to have a more robust plan to address 7.15.

4. Comment on Section 7.42

- What is the reason 'Places of Worship' don't receive CIL contributions? I am sure there is a valid reason that I am unaware of but just in case it is with prejudice I would like to ask the question.

In addition to commenting directly on the Local Plan, I would also like to highlight some areas where the Plan doesn't go far enough. In contrast, the London Plan is extremely positive towards faith groups in a way that I feel the Local Plan isn't.

London Plan Policy 3.1 D

"Boroughs may wish to identify significant clusters of specific groups (such as those who experience particular disadvantage and social exclusion) and consider whether appropriate provision should be made to meet their particular needs such as cultural facilities, meeting places or places of worship."

The London Plan makes a clear link between the provision of Places of Worship and the care for disadvantaged and excluded members of the community. The London Plan encourages LDF's to consider this and make appropriate provision. I can't see this link between local provision and places of worship acknowledged in the Local Plan.

London Plan 3.5

"It is important that the needs of all in society, such as faith groups, are addressed- if necessary through co-ordinated action with neighbouring boroughs. How these needs should be met is a matter for local determination; delivery will be the responsibility of boroughs, working with communities, through local strategic partnerships and other relevant locally based partnerships and organisations to identify those with greatest needs in a particular area, and the mechanisms by which they can be met, using statements of community involvement to support this (Policy 3.16, paragraph 3.88). A social infrastructure service delivery plan or published programme, possibly included in a community strategy and reflected in LDFs, may be a useful tool when assessing planning applications for development that affects existing, new or replacement social and community facilities."

The London plan has clear and proactive wording that includes 'identify need and have mechanisms by which they can be met'. I see no evidence in the Local Plan to 'identify' and put in place 'mechanisms' to address meeting the needs of faith groups.

I don't see any reference to a 'social infrastructure delivery plan' in the Local Plan. This would be a very positive approach in addressing the lack of provision for faith groups. Does Hillingdon have a 'Social Infrastructure Delivery Plan' that can address the needs of faith groups and positively influence the Local Plan?

To summarise my comments...

I would like to ensure 'faith groups' and 'places of worship' are clearly identified with any definition of 'Community Infrastructure'.

I would also like section 7.15 to...

- Be more strongly influenced by the London Plan
- To show greater ambition on the Council's part to address the lack of provision
- For a clearer picture of how individual faith groups interact with the Council on these matters

Thank you for providing this opportunity to comment.

Yours sincerely,



James Hunting



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PART A - Your Details (must be completed)

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Henry Streeter (Sand and Ballast) Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Simon
Last name	Chaffe
Company	Matthews and Son LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 6.2 – Wall Garden Farm Sand Heaps – SINC New 1
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es) ✓

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Not Legally Compliant and Failure with the requirement to comply with the Duty to Cooperate and Unsound.

1. Policy EM7: Biodiversity and Geological Conservation of the Borough's Part 1 Strategic Policies (adopted Nov 2012) provides the Policy background to the consideration of new SINC designations, based on previous discussions with the GLA. It seems that these previous discussions referred to are those mentioned in paragraphs 5.16 and 5.17 of the consultation document, being a review of SINC's (2005) and an Ecology Handbook 8 respectively. We understand that neither are included in the evidence base.
2. Extraction from the original Wall Garden Farm site was allowed on appeal in 1978, and since then various extensions have been permitted both north and south of Sipson Lane, including the requirement to restore of the area identified as SINC New 1 to agriculture.
3. The identified proposed new SINC at Wall Garden Farm is currently operational and includes the mineral processing plant.
4. The Statement of Community Involvement (November 2006) (SCI) has not been observed. Section 4 of the SCI describes the various stages to be followed and these include the involvement of relevant stakeholder groups.
5. We are not aware that our client as landowner of the identified land and operator of the quarry on both sides of Sipson Lane has either been formally notified by the Borough of its SINC aspirations or received any request to inspect the site to assess its suitability as a SINC. We are not aware of any discussions at the Borough that may have been held to unreasonably constrain mineral processing operations or revise the agricultural restoration requirements.
6. The London Plan 2011 and the Local Plan Part 1 define Nature Conservation in their Glossaries as:

Protection, management and promotion for the benefit of wild species and habitats, as well as the human communities that use and enjoy them. This also covers the creation and re-creation of wildlife habitats and the techniques that protect genetic diversity and can be used to include geological conservation.
7. Policy 7.19 (Biodiversity and Access to Nature) of the London Plan 2011 states in respect of LDF preparation:

In their LDFs, boroughs should:
 - a. *use the procedures in the Mayor's Biodiversity Strategy to identify and secure the appropriate management of sites of borough and local importance for nature conservation in consultation with the London Wildlife Sites Board.*
 - b. *identify areas deficient in accessible wildlife sites and seek opportunities to address them*
 - c. *include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their populations and their extent via appropriate BAP targets*
 - d. *ensure sites of European or National Nature Conservation Importance are clearly identified.*
 - e. *identify and protect and enhance corridors of movement, such as green corridors, that are of strategic importance in enabling species to colonise, re-colonise and move between sites*
8. Paragraphs 5.11 – 5.19 of the September 2014 Proposed Submission Version explain the process by which SINC's have been identified. We can find no reference to the Mayor's Biodiversity Strategy or the London Wildlife Sites Board (as referred to in item 7 above)..

9. Paragraph 5.16 in particular refers to a review of SINC's in 2005. We understand that this review is a GLA document but that it has not been included in the evidence base. We are therefore unable to establish what the review says about SINC New 1. Furthermore, it explains that there would be formal consultation with landowners. As far as we are aware our client as landowner of the identified land and operator of the quarry on both sides of Sipson Lane has neither been formally notified nor consulted.
10. Paragraph 5.17 refers to Ecology Handbook 8 although, as with the GLA's 2005 review, we are unable to find this document in the evidence base and establish what it says about proposed SINC New 1.
11. Paragraph 5.18 states that the responsibility for designating SINC's has been passed from the GLA to the London Boroughs since the adoption of the London Plan 2011, although we are unable to find evidence to this effect.
12. Policy EM7: Biodiversity and Geological Conservation of the Borough's Part 1 Strategic Policies (adopted Nov 2012) explains that,
- '...new designations...will be based on previous recommendations made in discussions with the Greater London Authority.'*
- My client is not aware of any such discussions in respect of Wall Garden Farm and, if it had been, it would not have supported any such recommendation.
13. Policy EM7 continues to explain that
- '...biodiversity and geological conservation will be ...enhanced with particular attention to...'*
- The identification of the Wall Garden Farm site does not appear to satisfy any of the seven criteria stated.
14. Paragraph 7.27 of Local Plan Part 2 – Development Management Policies states that all SINC's are open to the public. There is no prospect of this site ever becoming publicly accessible.

The proposed SINC should be withdrawn on the grounds that:

- the correct protocols in terms of identification and engagement have not been used as far as we can tell
- the land is operational
- the permitted restoration is to agriculture
- it does not have the support of the landowner
- it will not be accessible to the public
- it is not 'appropriate' in terms expressed in Policy EM7 (line 2).

Footnote:

Since drafting the above comments we have contacted the Principal Sustainability Officer of the Borough. He has kindly provided a two page extract of the 2005 document referred to at paragraph 9 above, being the relevant SINC citation. This confirms that at the time the sand heaps associated with the mineral extraction supported a breeding colony of sand martins and that the surrounding area provided a good habitat for them. These sand heaps no longer exist.

Sand martins are frequently observed at sand and gravel quarries. Their legal status is described as follows on the RSPB website;

(<http://www.rspb.org.uk/discoverandenjoynature/discoverandlearn/birdguide/name/s/sandmartin/legal.aspx>)

'Sand martins and their nests are fully protected by the Wildlife and Countryside Act 1981. Under the Act it is an offence to intentionally kill, injure or take any wild bird. It is an offence to intentionally take, damage or destroy the eggs or nest of a sand martin while it is in use or being built.'

Sand martins often turn up at active sand quarries. They will tunnel into the quarry face even when the sand is being excavated, and in some cases have been known to start nesting in heaps of loose sand.

Quarry owners and their workers are likely to be helpful if warned about nesting sand martins, and can often work around the colony or avoid the immediate area until nesting has finished.'

Any occupation of quarry workings by sand martins is seasonal and is accommodated as required. In our opinion, identification of them on the site does not mean that it is valuable to sand martins; the habitat can change (or even disappear) from one breeding season to another, as is the case here.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Withdraw the proposed SINC at Wall Garden Farm.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

A discussion on these fundamental issues is necessary and warrant further elaboration at an EiP hearing.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Henry Streeter (Sand and Ballast) Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Simon
Last name	Chaffe
Company	Matthews and Son LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	8 Mineral Safeguarding
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

8.1:

The Key Objective of the Local Plan Part 1 of making a proportionate contribution to West London's mineral allocation is not achieved through Mineral Safeguarding as defined in the NPPF and NPPG (cross-refer to our representations in respect of MIN1 and MIN2).

8.4:

Contrary to the statement in this paragraph the Minerals Technical Background Report (2008) does not conclude that 'there are three sites able to provide the defined aggregates requirement over the plan period for the Borough' and to claim that it does is misleading. Safeguarding these sites will not deliver the defined aggregates requirement over that plan period.

The 2008 Report does, however, conclude that the sites identified in MIN1 are 'best suited to identification as Preferred Areas'.

This is an important distinction for reasons explained in our submission in respect of MIN1 and MIN2.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

In the context of our representations regarding MIN1 and MIN2 this section should be deleted and rewritten.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The issues described above are fundamental to mineral provision and apportionment and would warrant further elaboration at an EiP hearing.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Henry Streeter (Sand and Ballast) Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Simon
Last name	Chaffe
Company	Matthews and Son LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

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(please tick relevant box)

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<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	MIN 1: Safeguarding Areas for Minerals MIN2: Additional Safeguarded Sites for Minerals
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Not legally or procedurally compliant, failure with the requirement to comply with the Duty to Cooperate and unsound.

Consistency with National Policy:

Policy MIN1 only partially recognises the NPPF (paragraph 143) and the NPPG.

There seems to be confusion between the requirement to identify new sites for mineral extraction (the first bullet point in para 143) and to define Mineral Safeguarding Areas (MSAs) (the third bullet point in para 143).

This apparent confusion seems to be perpetuated from the Local Plan Part 1: Strategic Policies that incorporates references to 'Preferred Mineral Safeguarding Areas', this not being a recognisable or defined term in the NPPF or the NPPG. Equally, the 2013 Local Aggregates Assessment (July 2014) (the LAA) describes these as 'Preferred Mineral Areas', all then being described in the Local Plan: Part 2 Development Management Policies (the DMP) as 'Mineral Safeguarding Sites'.

The DMP does not identify new sites but it defines MSAs and expects the MSAs to deliver the stated apportionment as stated in DMP paras 6.60 to 6.62.

Having defined what it calls MSAs and shown them on a plan the DMP does not then develop the requirement to define Minerals Consultation Areas (MCAs) (see NPPG 'Mineral Safeguarding'), nor does it show any on a plan. Whilst it is recognised that MCAs are particularly useful in areas where there are two tiers of Local Government there is nothing that allows (as far as we are aware) Metropolitan Boroughs (as MPAs) to opt out of this requirement, the identification of MCAs being useful not only for Tier 2 Local Planning Authorities but also for prospective developers.

If the intention is that the defined MSAs deliver the Borough's allocation then approach should be as set out in the NPPG ('Planning for minerals extraction') and the NPPF (para 145, bullet 3) where appropriate sites are identified,

'...in one or more of the following ways (in order of priority):

- 1. designating Specific Sites – where viable resources are known to exist, landowners are supportive...and the proposal is likely to be acceptable in planning terms...*
- 2. designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated....*
- 3. Designating Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted...*

The requirement to categorise sites in this way has not been recognised despite the Final Assessment (paras 8.6.9 to 8.6.13) of the Borough's LDF Background Technical Report – Minerals – (April 2008) (the 2008 Report) concluding that the three sites listed in MIN1 would be, 'best suited to identification as Preferred Areas...'.

Effectiveness:

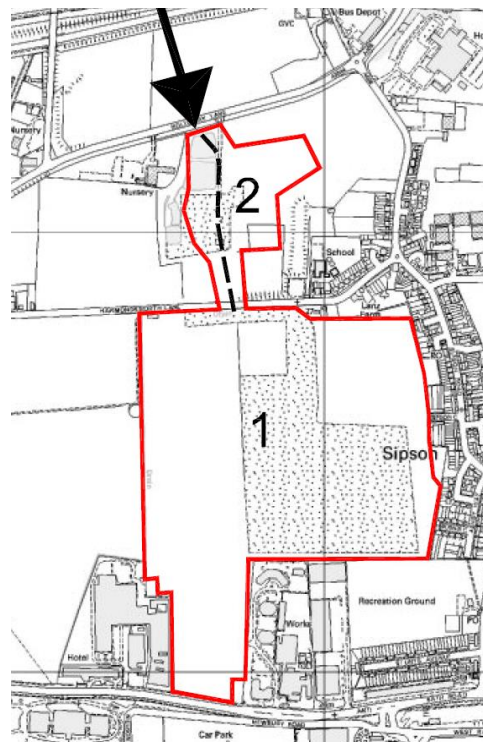
The plan is not deliverable over its period because it fails to identify sites in accord with the relevant parts of paragraph 145 of the NPPF and the NPPG as described above.

On the basis that the following sites contain viable resources, are deliverable (having landowner and mineral operator support) and are likely to be acceptable in planning terms (having either benefitted previously from a planning permission for mineral extraction or being adjacent to existing workings), we consider that the following Specific Sites should be identified:

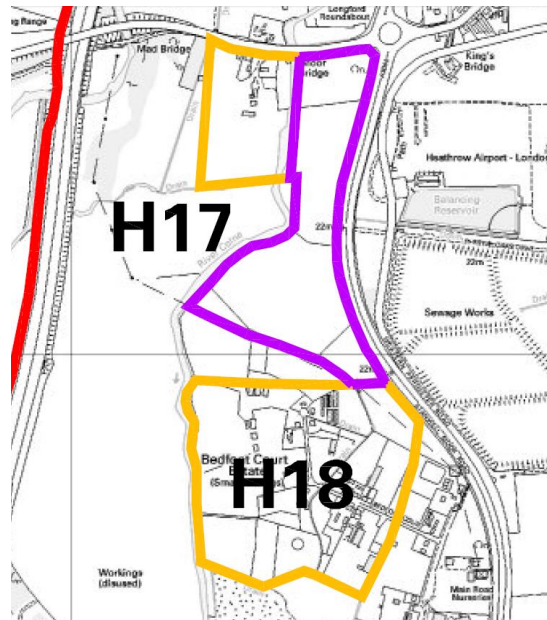
- Land south of Harmondsworth Quarry and north of the A4.

This is the southerly rectangular block of land (set between two developed plots of land) within Plan A below which is an extract from Map 7.1b of the 2008 Report which in turn variously and incorrectly, we believe, shows the area as having planning permission – see also Fig 1, Map 6.2, Map 6.3, Map 6.4b and Map 7.1b.

Plan A (extract from Map 7.1b, 'Current Minerals Sites and Access Points (South)', 2008 Report):



- Land at Bedfont Court (Plan B) (as described as Site H18 in the 2008 Report)
Plan B (extract from Map 8.2b, 'Initial Assessment of Possible Minerals Sites (South)', 2008 Report):



To the best of our knowledge two of the sites listed in MIN1 could be considered as Preferred Areas (known resources where planning permission might reasonably be anticipated; we have seen no evidence of landowner support):

- Land west of Harmondsworth Quarry
- Land north of Harmondsworth.

Justification:

The plan does not set out the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

Positive preparation:

In not identifying Specific Sites, Preferred Areas or Areas of Search the plan is not based on a strategy seeking to meet objectively assessed development and infrastructure requirements.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

MIN1 and MIN2

Delete and replace with a policy (or policies) that (recognizing the criteria set out in the Guidance) establishes Specific Sites, Preferred Areas, Areas of Search, Minerals Safeguarding Areas and Mineral Consultation Areas, all of which to be shown on accompanying plans.

Specific Sites to include:

- Land South of Harmondsworth Quarry
- Land at Bedfont Court

Preferred Areas (as described in the 2008 Report) to include:

- Land West of Harmondsworth Quarry
- Land North of Harmondsworth.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The issues described above are fundamental to mineral provision and apportionment and would warrant further elaboration at an EiP hearing.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



HILLINGDON

LONDON

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Title			
First name			
Last Name			
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Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Simon
Last name	Chaffe
Company	Matthews and Son LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	MIN4: Minerals Capacity
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The NPPF para 143 (bullet 6) states that in preparing Local Plans, LPAs should ‘...take into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;...’.

In this context the basis for Policy MIN4 is not clear and therefore cannot be consistent with National Policy, effective, justified or positively prepared.

In particular evidence for the choice of 165 hectares should be provided together with the special factors that exempt the sites in MIN1.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Add further justification for MIN4 or delete as appropriate.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The issues described above are fundamental to mineral provision and apportionment and would warrant further elaboration at an EiP hearing.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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under 15 25 – 44 65 – 85
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3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
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HILLINGDON

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2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Simon
Last name	Chaffe
Company	Matthews and Son LLP
Unit	
House name	
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	6.58
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Paragraph 6.58 recognises that the Borough is a major source of recycled construction materials, typically using construction, demolition and excavation (CDE) materials. CDE materials can be used for quarry restoration purposes under the terms of valid planning permissions for mineral extraction.

Whilst the LAA identifies certain aggregates recycling facilities in the Borough the draft Plan does not appear to recognise Policies 5.18 and 5.20 of the London Plan.

- Policy 5.18 encourages CDE recycling facilities at existing mineral extraction sites.
- Policy 5.20 requires Mineral Planning Authorities to support the development of aggregate recycling facilities and, in order to reduce the environmental impact of aggregates, appropriate use to be made of planning conditions dealing with restoration, aftercare and re-use of mineral sites. Options include restoration to original ground levels using appropriate CDE waste. These Policies should be recognised in contributing to the delivery of the Plan.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. *(It will be helpful if you are able to*

put forward suggested revised wording of any or text. Please be as precise as possible)

Encouragement of recycling CDE materials should be enshrined in Policy.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

No, I do not want to participate in the oral examination

<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The issues described above are fundamental to the efficient use of primary and secondary resources and would warrant further elaboration at an EiP hearing.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
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<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
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<input type="checkbox"/>	Consultation statement
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Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	6.65
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Paragraph 6.65 states,

'Minerals extraction is considered in broad terms to be an optimum compromise between the demands of industry (to consume aggregate) and the aspirations of local residents (to see a cessation of quarrying).'

This statement could be considered to express the MPA's approach to planning for mineral extraction. Sight of the justification for this statement would be welcome.

Indeed, the NPPF (para 142) recognizes that,

'Minerals are essential to support sustainable economic growth and our quality of life. It is therefore important that there is a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs. However, since minerals are a finite natural resource, and can only be worked where they are found, it is important to make best use of them to secure their long-term conservation.'

Paragraph 6.65 is too simplistic and does not reflect societal demands for minerals which need to be balanced, amongst others, against the aspirations of local residents (that could reasonably include the proper management of mineral extraction, but not its cessation). Industry does not create any demand for mineral, it satisfies the needs of society.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Delete the first sentence of paragraph 6.65.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The issues described above are fundamental to ensuring that the Mineral Planning Authority acknowledges the approach to mineral planning as set out in guidance and would warrant further elaboration at an EiP hearing.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

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Hillingdon Local Plan Part 2 Regulation 19 Consultation Response October 2014

1 message

WALKDEN, NIGEL <[REDACTED]>

24 October 2014

11:39

To: "localplan@hillington.gov.uk" <localplan@hillington.gov.uk>

Cc: M25 Planning <[REDACTED]>, "Hall, Stephen"

<[REDACTED]>

Dear Sir/Madam,

Thank you for you for inviting the Highways Agency (HA) to comment on the draft submission Local Plan Part 2 produced by the London Borough of Hillington. This email comprises the HA's official representation.

The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case of Hillington, this relates to the M25 Junctions 14 to 17, the M4 Junctions 3 to 4b, the M40 Junctions 1 and 1a and the A3113. Sections of the M4 and M25 are currently congested during the peak hour period. Consequently, we would be concerned if any material increase in traffic were to occur on these sections of the SRN as a result of development in Hillington without careful consideration of mitigation measures.

We have the following points to make in relation to the Development Management Policies. Policy DMT1 Managing Transport Impacts should refer specifically to the strategic road network under the governance of the Highways Agency in point (v). We are however generally content with the rest of the wording for the policy.


As a fundamental point we would expect the local plan not to rely on future transport assessments that accompany planning applications. This may lead to an underestimation of the real impacts of the Local Plan in transport terms. Given that many developments across the borough identified in the site allocations may not individually have any significant impact, the combined impact may be significant and should be examined. Therefore, we would expect Hillington to produce a transport assessment covering the cumulative impacts of the Local Plan development as a whole compared to a scenario with only committed development. This should be done for the Local Plan horizon year. Without such an assessment there is no real evidence on transport grounds to declare the plan sound based upon the NPPF "justified" criteria.

The plan should demonstrate that all development can be accommodated on transport grounds including evidence that any required mitigation (infrastructure or other measures) is affordable from identified funding sources and deliverable.

Without such an assessment, significant Local Plan related transport impacts may pass unnoticed, or the plan may be reliant upon allowing development that cannot be realised because mitigation measures for individual developments are not affordable and viable, and therefore the plan will not be sound. Please refer to Department for Transport guidelines “Transport Evidence Bases in Plan Making” <http://planningguidance.planningportal.gov.uk/blog/guidance/transport-evidence-bases-in-plan-making/transport-evidence-bases-in-plan-making-guidance/>.

Paragraph 8.12 states that “Development proposals for new or altered access on higher order roads than local access roads will be required to demonstrate no suitable alternative access point...”. For information HA policy enshrined in Department for Transport Circular 02/2013 states that new accesses will not be allowed onto roads of near motorway standard, including the A3113.

Policy DMAV2 Heathrow Airport point A(iii) states that development within the boundary will only be supported where “there is no increase in traffic and congestion from the proposal”. Since any development could potentially generate traffic this statement could be considered ambiguous and should be reworded “there is no detrimental impact to the safe and efficient operation of local and strategic transport networks”.

We hope that you find these comments useful. Please contact Stephen Hall  if you require further information.

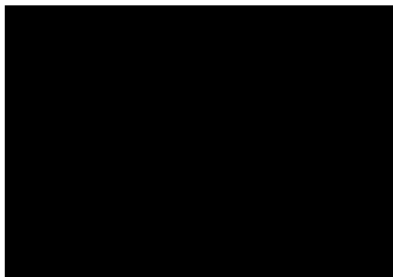
Nigel Walkden

BA MSc MBA CMILT

Associate, Highways and Transportation

Parsons Brinckerhoff


Westbrook Mills



Sent on behalf on the Highways Agency

Also contactable at the Highways Agency, Dorking

Nigel Walkden

Highways Agency 

Web: <http://www.highways.gov.uk>

Safe roads, reliable journeys, informed travellers

Highways Agency, an executive agency of the Department for Transport.

The original of this email was scanned for viruses by the Government Secure Intranet virus scanning service supplied by Vodafone in partnership with Symantec. (CCTM Certificate Number 2009/09/0052.) This email has been certified virus free.

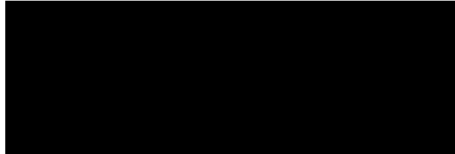
Communications via the GSi may be automatically logged, monitored and/or recorded for legal purposes.

Part A - your details

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Your name and address

Title Mr
 First name Ben
 Last name Woolman
 Address
 Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)



Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

I believe plan is unsound as it has not considered all greenbelt opportunities that have not been put forward.

Please set out what change(s) you consider necessary A further review into more suitable potential greenbelt sites, to ensure the Local Plan Part 2 is sound or has been including ones that have not come forward. prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Outline potential other greenbelt sites.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

title plan .pdf

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
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Monitoring





TITLE NUMBER
AGL84477

HILLINGDON

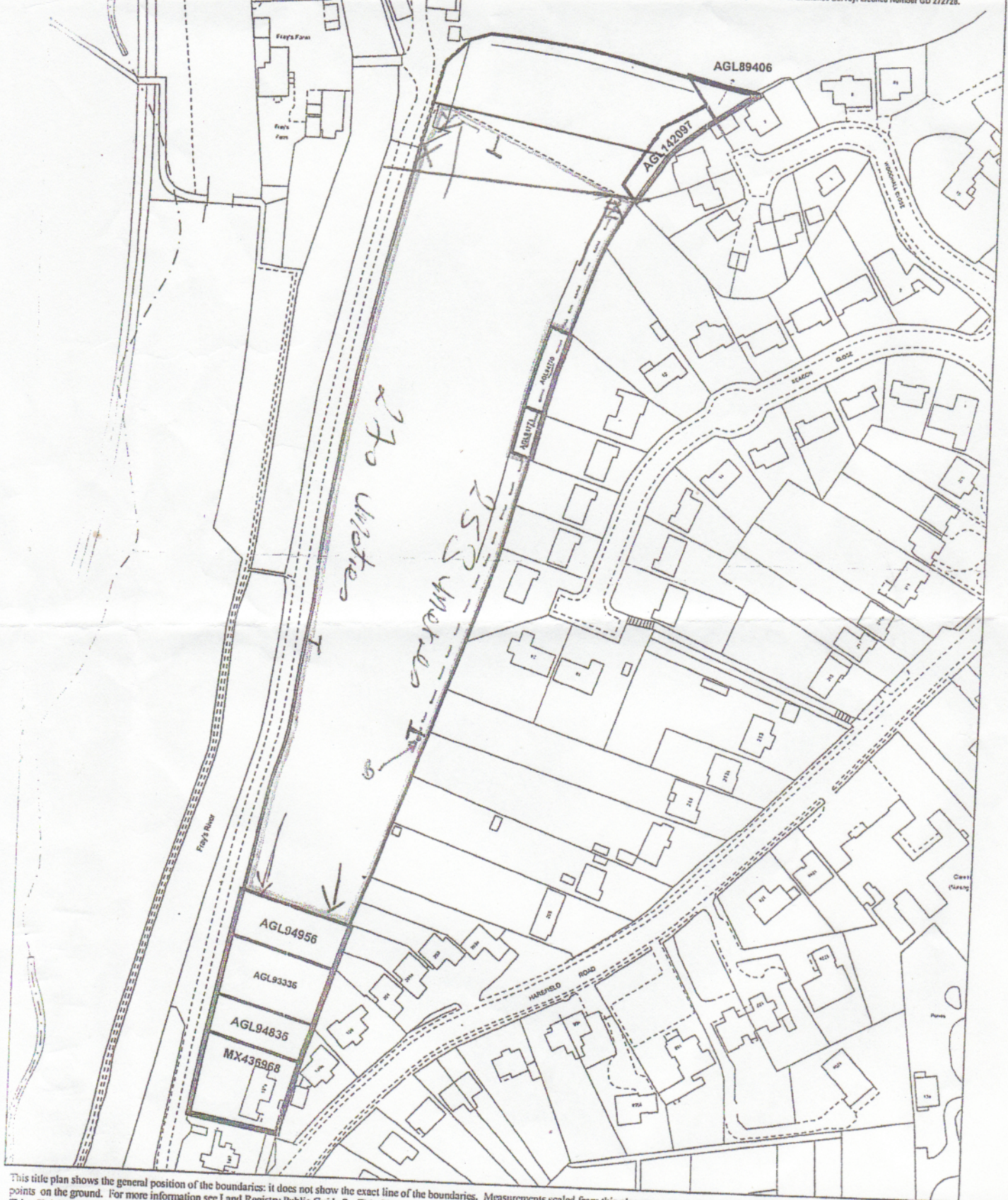


ORDNANCE SURVEY MAP REFERENCE:

TQ5855E

SCALE 1:1250

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This title plan shows the general position of the boundaries: it does not show the exact line of the boundaries. Measurements scaled from this plan may not match measurements between the same points on the ground. For more information see Land Registry Public Guide 7 - Title Plans.
This official copy shows the state of the title plan on 23 September 2005 at 8:57:16. It may be subject to distortions in scale.
Under s.67 of the Land Registration Act 2002, this copy is admissible in evidence to the same extent as the original.
Issued on 23 September 2005.
This title is dealt with by the Swansea District Land Registry.

--- Sewer / drain
--- surface between under drain
X - access





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

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1. Name and Address	
Title	
First name	
Last Name	
Organisation (if relevant)	LaSalle Investment Management
Unit	House number
House name	
Address 1	c/o Agent
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	Miss
First name	Wakako
Last name	Hirose
Company	Rapleys LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Odyssey Business Park LSEL
Paragraph Number; or	
Table or Figure Number; or	MAP G
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

LaSalle is committed to its significant interest in Odyssey Business Park, and will invest in the ongoing maintenance and management of the site in order to ensure that the Business Park will retain its attractiveness and high quality office environment. In this context, we consider that the recognition of the importance of Odyssey Business Park as a vibrant office park, supporting the Borough's economy, as one of the Locally Significant Employment Locations ('LSEL') is appropriate.

We would, however, object to the designation of Odyssey Business Park as a LSEL, unless changes are made to the Development Management Policies for proposals within LSELS.

Please refer to the accompanying letter for our full representations.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address	
Title	
First name	
Last Name	
Organisation (if relevant)	LaSalle Investment Management
Unit	House number
House name	
Address 1	c/o Agent
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	Miss
First name	Wakako
Last name	Hirose
Company	Rapleys LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME1
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME1

From our client's experience in managing a number of offices, it is vital that there are a variety of 'amenities' for tenants' employees/visitors in order to keep the offices economically viable and attractive to occupiers. Whilst paragraph 2.8 recognises that amenity type uses for industrial occupiers could be supported on designated employment sites, we consider that the paragraph should not restrict this to industrial occupiers only. Furthermore, this should be incorporated in Policy DME1 as uses permissible on designated sites.

Policy DEM1 (D)

The current occupancy level of Odyssey Business Park is good. That said, however, circa 20,600 sq.ft of office floorspace is currently vacant. Part (including the parking area) or whole of the site could become available for alternative use/development in the future, in the event that the current vacancy does not improve, despite our client's marketing campaign and/or occupier demand declines.

It is noted that the emerging London Plan, which is currently undergoing the examination process, has increased the minimum housing target across all London Boroughs. For Hillingdon, the annual housing target has increased from 425 dwellings to 559 dwellings. Odyssey Business Park is in a highly sustainable location for housing and isolated from other designated employment sites. As such, it represents a potential opportunity site to address the Borough's housing needs in the event that part or whole of the site becomes available for alternative use or redevelopment.

Policy DME1 (D) should therefore recognise that office sites, such as Odyssey Business Park, are suitable for residential use, and could be released for alternative uses that meet the Borough's identified development needs. This approach is endorsed by the National Planning Policy Framework ('NPPF') which advises that alternative uses of land or building should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities (paragraph 22). This is also considered appropriate in the context of the Government's approach to boosting housing stock though the introduction of permitted development rights for the change of use from offices to residential.

Additionally, we consider that Policy DME1 (D) as currently drafted is too restrictive, and does not allow for sufficient flexibility to respond to changing economic circumstances. This is contrary to the NPPF, which advises against the long term protection of designated employment sites where there is no reasonable prospect of a site being used for that purpose (Paragraph 22).

More specifically, we object to each of the criteria as follows:

- *There is no realistic prospect of the land being used for industrial or warehousing purposes in the future.*

This is an inappropriate and unjustified criterion for LSELs on the basis that the role and function of LSEL sites are clearly defined as employment uses falling within Class B1 only. The criterion would appear to suggest that LSELs should be safeguarded for Class B2 and B8 uses in addition to B1. Odyssey Business Park adjoins residential areas, and has constraints in terms of access by heavy goods vehicles or for distribution and logistic purposes. This makes the site inappropriate for B2 and B8 uses, and therefore should not be safeguarded for such uses. Moreover, the Council's evidence base (Updated Employment Land Study 2014) projects a decreasing demand (surplus) for industrial and warehousing land between 2013 and 2026, in the region between 16.3 and 20.6ha. The criterion is at odds with the objectives of the LSEL designation and the Council's evidence base.

There is no sound basis for this criterion to be applied to LSEL sites, as it will potentially lead to unnecessarily delay the delivery of use/development that would meet the needs of the Borough.

- Sites have been vacant and consistently marketed for a period of 2 years.

It is considered that this criterion would place an unnecessary barrier for sites which are designated as employment land of local importance, rather than Strategic Industrial Locations having London-wide strategic importance. The approach is contrary to the NPPF which requires that policies should allow a rapid response to changes in economic circumstance (paragraph 21). In this context, the 2 year marketing period is excessively long, and will inevitably delay the delivery of uses or development which would contribute to local economy and/or meet the needs of the Borough. Therefore, the marketing period should be reduced from 2 years to 12 months.

Please refer to the accompanying letter for our full representations.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy DME1

Insert the additional paragraph in the policy as follows:

“Proposals for small and medium sized enterprises and walk to services (such as crèche, gym, hotel, small scale food/retail outlets and cafes) on designated employment sites that support occupiers and encourage business growth will be permitted if they are of a scale and function that enhances the established role and business function of designated sites.”

Policy DME1 (D)

Separate the policy criteria for LSIS from LSEL and amend the criteria for LSEL as follows:

“Other uses defined as economic development, and residential use will be acceptable in LSIS and LSELS only where:

- ~~· There is no realistic prospect of the land being used for industrial or warehousing purposes in the future; and~~*
- Sites have been vacant and consistently marketed for a period of 12 months 2 years; or it can be demonstrated that there is no realistic prospect of the land being used for B1 purposes in the future, taking into account viability issues; and*
- The proposed alternative use does not conflict with the policies and objectives of this plan.”*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Title	
First name	
Last Name	
Organisation (if relevant)	LaSalle Investment Management
Unit	House number
House name	
Address 1	c/o Agent
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	Miss
First name	Wakako
Last name	Hirose
Company	Rapleys LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraph 2.8
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME1

From our client's experience in managing a number of offices, it is vital that there are a variety of 'amenities' for tenants' employees/visitors in order to keep the offices economically viable and attractive to occupiers. Whilst paragraph 2.8 recognises that amenity type uses for industrial occupiers could be supported on designated employment sites, we consider that the paragraph should not restrict this to industrial occupiers only. Furthermore, this should be incorporated in Policy DME1 as uses permissible on designated sites.

Please refer to the accompanying letter for our full representations.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

"In addition to `B' class uses, ~~the Council may also permit proposals for appropriate small and medium sized enterprises and small scale "walk to" services that support for industrial occupiers and workforce and encourage business growth such as workplace crèche, gym, hotel, small scale food/retail outlets or cafes on designated employment sites~~ ~~SILs and locally designated sites~~ will be permitted. Proposals for these uses should be discussed with the Council in advance of the submission of a planning application."

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

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N/A

Please continue on a separate sheet if necessary

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Male Female

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No Yes

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a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
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WH/840/64/1

28 October 2014

London Borough of Hillingdon
Planning Policy Team
3N/02 Civic Centre
High Street
Uxbridge
UB8 1UW

Dear Sir/Madam

**RE: HILLINGDON LOCAL PLAN PART 2 PROPOSED SUBMISSION CONSULTATION 2014
REPRESENTATIONS ON BEHALF OF LASALLE INVESTMENT MANAGEMENT**

We act on behalf of LaSalle Investment Management ('LaSalle'), and have been instructed to submit representations to the above consultation. We request that the contents of this letter and the accompanying consultation form are taken into account as part of the current consultation.

Our client has recently acquired the freehold of Odyssey Business Park in South Ruislip, which is an established office complex, comprising circa 141,600 sq.ft of office accommodation, and is substantially occupied, with circa 20,600 sq.ft of vacant floorspace currently available. The site represents LaSalle's significant interest in the Borough, and as a new landowner, LaSalle wishes to ensure that there is an appropriate policy framework for the Business Park.

In these terms, the focus of our representations to the current consultation is to secure the site's long term future as offices whilst allowing flexibility to ensure that policy can respond to changing economic circumstances in the future. Our representations, set out below, are made in the context above, and we would request that the Council takes full account as part of the current consultation.

Representations

Site Allocations and Designations

As outlined above, LaSalle is committed to its significant interest in Odyssey Business Park, and will invest in the ongoing maintenance and management of the site in order to ensure that the Business Park will retain its attractiveness and high quality office environment. In this context, we consider that the recognition of the importance of Odyssey Business Park as a vibrant office park, supporting the Borough's economy, as one of the Locally Significant Employment Locations ('LSEL') is appropriate.



We would, however, object to the designation of Odyssey Business Park as a LSEL, unless changes are made to the Development Management Policies for proposals within LSEs.

Our representations on the Development Management Policies are set out below.

Development Management Policies

B Class Uses Supported within LSEs – Policy DME1 (C)

We consider that it is appropriate to provide policy support for the prosperity and growth of the high quality office sites. In this regard, we consider that Policy DME1 (C) which supports Class B1 a,b,c uses within LSEs is appropriate as it clearly defines the distinct role of LSEs in contrast to the Locally Significant Industrial Sites, which are safeguarded for Classes B2 and B8 uses.

Non-B Class Uses Permissible within LSEs – Policy DME1/Supporting Paragraph 2.8

From our client's experience in managing a number of offices, it is vital that there are a variety of 'amenities' for tenants' employees/visitors in order to keep the offices economically viable and attractive to occupiers. Whilst paragraph 2.8 recognises that amenity type uses for industrial occupiers could be supported on designated employment sites, we consider that the paragraph should not restrict this to industrial occupiers only. Furthermore, this should be incorporated in Policy DME1 as uses permissible on designated sites. We therefore suggested the following amendments.

- *Suggested Amendments to Paragraph 2.8*

*"In addition to 'B' class uses, ~~the Council may also permit proposals for appropriate small and medium sized enterprises and small scale "walk to" services~~ **that support for industrial occupiers and workforce and encourage business growth such as workplace crèche, gym, hotel, small scale food/retail outlets or cafes on designated employment sites** ~~SILs and locally designated sites will be permitted~~. Proposals for these uses should be discussed with the Council in advance of the submission of a planning application."*

- *Suggested Insertion to Policy DME1*

"Proposals for small and medium sized enterprises and walk to services (such as crèche, gym, hotel, small scale food/retail outlets and cafes) on designated employment sites that support occupiers and encourage business growth will be permitted if they are of a scale and function that enhances the established role and business function of designated sites."

Alternative Uses on LSEs and Policy Criteria – Policy DME1 (D)

The current occupancy level of Odyssey Business Park is good. That said, however, circa 20,600 sq.ft of office floorspace is currently vacant. Part (including the parking area) or whole of the site could become available for alternative use/development in the future, in the event that the current vacancy does not improve, despite our client's marketing campaign and/or occupier demand declines.



It is noted that the emerging London Plan, which is currently undergoing the examination process, has increased the minimum housing target across all London Boroughs. For Hillingdon, the annual housing target has increased from 425 dwellings to 559 dwellings. Odyssey Business Park is in a highly sustainable location for housing and isolated from other designated employment sites. As such, it represents a potential opportunity site to address the Borough's housing needs in the event that part or whole of the site becomes available for alternative use or redevelopment.

Policy DME1 (D) should therefore recognise that office sites, such as Odyssey Business Park, are suitable for residential use, and could be released for alternative uses that meet the Borough's identified development needs. This approach is endorsed by the National Planning Policy Framework ('NPPF') which advises that alternative uses of land or building should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities (paragraph 22). This is also considered appropriate in the context of the Government's approach to boosting housing stock through the introduction of permitted development rights for the change of use from offices to residential.

Additionally, we consider that Policy DME1 (D) as currently drafted is too restrictive, and does not allow for sufficient flexibility to respond to changing economic circumstances. This is contrary to the NPPF, which advises against the long term protection of designated employment sites where there is no reasonable prospect of a site being used for that purpose (Paragraph 22).

More specifically, we object to each of the criteria as follows:

- *There is no realistic prospect of the land being used for industrial or warehousing purposes in the future.*

This is an inappropriate and unjustified criterion for LSEs on the basis that the role and function of LSEL sites are clearly defined as employment uses falling within Class B1 only. The criterion would appear to suggest that LSEs should be safeguarded for Class B2 and B8 uses in addition to B1. Odyssey Business Park adjoins residential areas, and has constraints in terms of access by heavy goods vehicles or for distribution and logistic purposes. This makes the site inappropriate for B2 and B8 uses, and therefore should not be safeguarded for such uses. Moreover, the Council's evidence base (Updated Employment Land Study 2014) projects a decreasing demand (surplus) for industrial and warehousing land between 2013 and 2026, in the region between 16.3 and 20.6ha. The criterion is at odds with the objectives of the LSEL designation and the Council's evidence base.

There is no sound basis for this criterion to be applied to LSEL sites, as it will potentially lead to unnecessarily delay the delivery of use/development that would meet the needs of the Borough.

- Sites have been vacant and consistently marketed for a period of 2 years.

It is considered that this criterion would place an unnecessary barrier for sites which are designated as employment land of local importance, rather than Strategic Industrial Locations having London-wide strategic importance. The approach is contrary to the NPPF which requires that policies should allow a rapid response to changes in economic circumstance (paragraph 21). In this context, the 2 year marketing period is excessively long, and will inevitably delay the



delivery of uses or development which would contribute to local economy and/or meet the needs of the Borough. Therefore, the marketing period should be reduced from 2 years to 12 months.

- Suggested amendments to Policy DME1 (D)

Separate the policy criteria for LSIS from LSEL and amend the criteria for LSEL as follows:

“Other uses defined as economic development, and residential use will be acceptable in LSIS and LSELS only where:

- ~~There is no realistic prospect of the land being used for industrial or warehousing purposes in the future; and~~
- Sites have been vacant and consistently marketed for a period of **12 months** ~~2 years~~, **or it can be demonstrated that there is no realistic prospect of the land being used for B1 purposes in the future, taking into account viability issues;** and
- The proposed alternative use does not conflict with the policies and objectives of this plan.”

Summary

We respectfully request that the Council fully considers the above representations to ensure that our client’s primary objective to retain and enhance the exiting office accommodation is reflected in the Local Plan Part 2. However, in order to make the LSEL and the associated Policy DME1 sound, we request that Policy DME1 is amended to provide a policy framework, which promotes growth and economic viability of the existing offices, whilst ensuring that there is sufficient flexibility to adapt to rapid changes in unforeseen circumstances in the future. This will ensure that there is an appropriate and clear policy framework to maximise the site’s potential to contribute to the Borough’s economic growth and/or housing provision.

We request that we are notified of progress of the Local Plan Part 2 and participation in the Examination hearings. We look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise, and we request that all correspondence is sent to Wakako Hirose at wh@rapleys.co.uk or on 020 7255 8042.

Yours faithfully

Rapleys LLP
info@rapleys.co.uk
0870 777 6292



HILLINGDON LOCAL PLA PART 2. GREEN CHAIN SITES

1 message

cs014u5161@blueyonder.co.uk <[REDACTED]>

28 October
2014 14:37

To: localplan@hillington.gov.uk

Cc: leader@hillington.gov.uk, [REDACTED]

THIS E-MAIL HAS BEEN SENT ON BEHALF OF MRS CONNIE EVANS

The Members of Oak Farm Residents Association object to the changing of wording of the Green Chain Policy (EM2) which was adopted in Local Plan Part 1.

It is the view of Members that the Council should provide the greatest possible protection for all Green Space in the London Borough of Hillingdon. All sites should remain protected by Green Chain Designation. Dual Designation of Green Chain and Metropolitan Open Land for all Sites. This would not alter Green Chain or MOL Policy.

MOL and Green Chain can each provide protection against inappropriate developments in different circumstances. Why is it not going to be used in Part 2? If the Developers wish to appeal to the Minister of States Inspectorate we feel that they would lose as the appeal for the Dual MOL and Green Chain Designation would be set and not the weak policy as in Local Plan Part 2.

Green Belt Land is the lungs of the London Borough of Hillingdon. Any whittling away alters the quality of life for our Residents. Every area of land that goes under concrete means extra air pollution plus greater chance of flooding!

Hillingdon Council and all its Residents should attach great importance to maintaining Green Belt not just in our own area but London as a whole. This has provided Londoners with vital open spaces making it a better place in which to live.

May we respectfully suggest that any figures for extra developments for housing put forward by Government are scrutinised by Planners and Councillors as figures are in many cases greater than required!

Yours faithfully,

Connie Evans (Mrs)
Chair
Oak Farm Residents Association



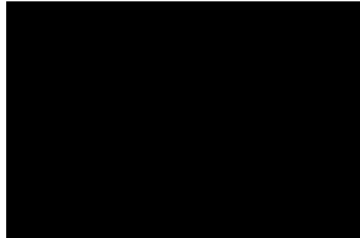
cc: Councillor Ray Puddifoot MBE, Leader of Council
Fran Beasley, Chief Executive
Sir John Randall MP Uxbridge and South Ruislip
Liz Seagal
Boris Johnson Mayor of London

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
First name David
Last name Short
Address



Postcode
Telephone, including area code
Email
Organisation (if relevant)

Agent's name and address (if applicable)

Title Nothing selected
First name
Last name
Address
Postcode
Telephone, including area code
Email
Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DME1
Paragraph number
Table or figure number
Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) 29.10.14 Rep. re. Hillingdon DME1 Local Plan Part 2 Policy.docx

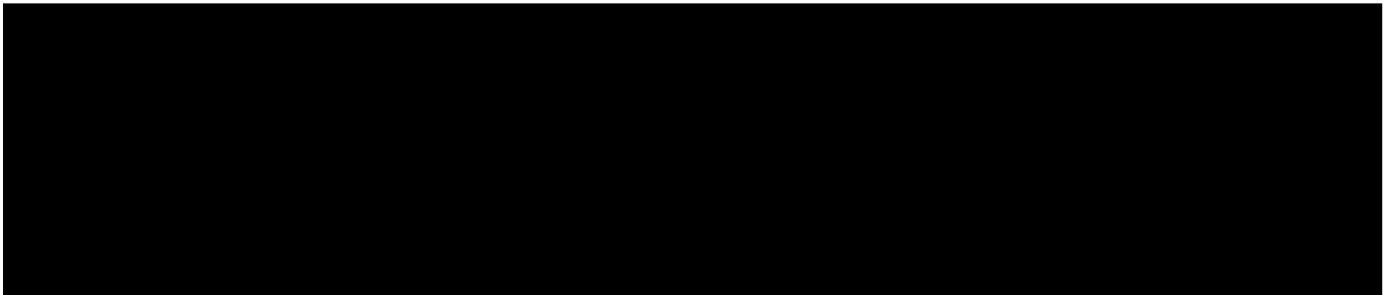
Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Hillingdon Borough Local Plan , Part 2 – Response to Policy DME1

The Emerson Group through a subsidiary company own property in parts of Hillingdon Borough used for commercial purposes. The policy in question does seem to be a logical approach to categorizing the hierarchy of employment sites within the Borough.

Additionally the provisions set out in (D) and (E) of the policy are supported as an equitable way of assessing the introduction of other uses within such areas.



HILLINGDON

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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	MR		
First name	DAVID		
Last Name	SHORT		
Organisation (if relevant)	THE EMERSON GROUP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME1
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SUPPORT IS GIVEN TO POLICY DME1.
THE EMERSON GROUP THROUGH A SUBSIDIARY COMPANY OWN PROPERTY IN PARTS OF HILLINGDON BOROUGH USED FOR COMMERCIAL PURPOSES. THE POLICY IN QUESTION DOES SEEM TO BE A LOGICAL APPROACH TO CATEGORISING THE HIERARCHY OF EMPLOYMENT SITES WITHIN THE BOROUGH. ADDITIONALLY THE PROVISIONS SET OUT IN (D) AND (E) OF THE POLICY ARE SUPPORTED AS AN EQUITABLE WAY OF ASSESSING THE INTRODUCTION OF OTHER USES WITHIN SUCH AREAS.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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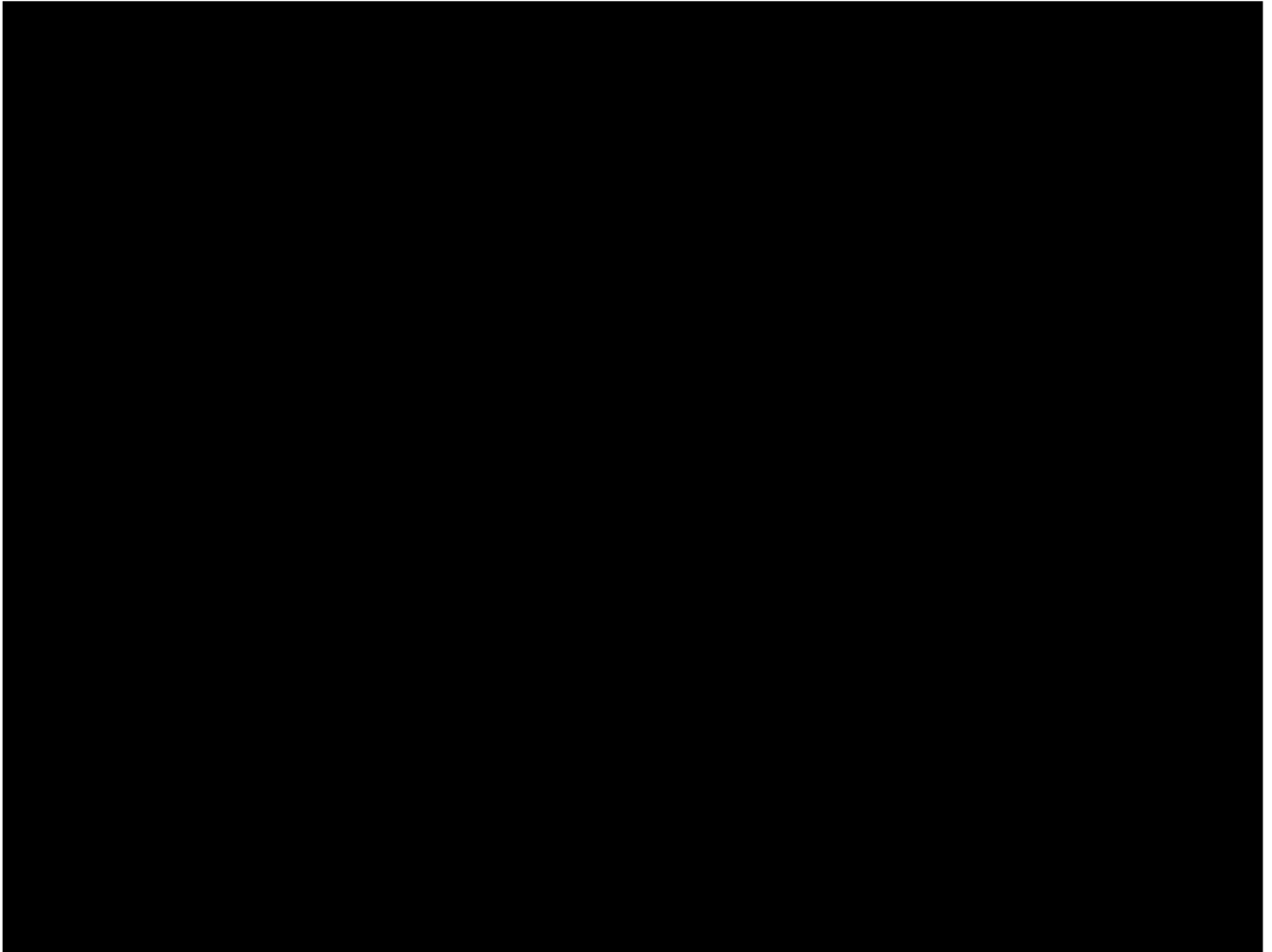
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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Monitoring Questions

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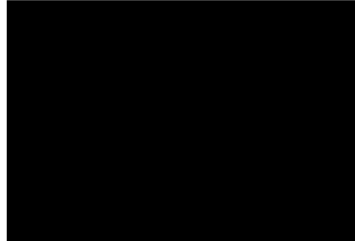
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
 First name David
 Last name Short
 Address

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)



Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number E2, E3
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes) 2.4

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) 29.10.14 Emerson Group Representation Re Hillingdon Local Plan Part 2 Policies E2 and E3.docx

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
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Monitoring





HILLINGDON

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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

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1. Name and Address			
Title	MR		
First name	DAVID		
Last Name	SHORT		
Organisation (if relevant)	THE EMERSON GROUP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	E2
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SUPPORT IS GIVEN TO POLICIES E2 AND E3, INCLUDING MAP 2.4.

THE GROUP, WHO OWN SEVERAL PROPERTIES IN THE HEATHROW AREA, WOULD SUPPORT THE THRUST OF THE ABOVE POLICIES AND ARE CONCERNED REGARDING THE PROPOSED EXPANSION OF HEATHROW AIRPORT SHOULD THE THIRD RUNWAY BE LOCATED NEXT TO BATH ROAD (A4) AS ONE OF THE THREE SCHEMES BEING CONSIDERED BY THE AIRPORTS COMMISSION. ALREADY THIS HAS AN IMPACT ON DECISION MAKING BY PROSPECTIVE TENANTS AND INCREASING VACANCY RATES.

IF THE THREAT OF THE THIRD RUNWAY NORTH OF THE A4 RECEDES THEN THE POLICY PROPOSALS IN THE LOCAL PLAN PART 2 ARE SUPPORTED AS IS THE INDICATION ON MAP 5.1 OF THE AREA FOR GROWTH OF OFFICE AND HOTELS LYING NORTH OF THE A4.

POLICY E2 IS A LOCAL ATTEMPT TO UNDERPIN THE BROAD POLICIES IN THE CORE STRATEGY TO ACCOMMODATE THE REQUIRED 9000 JOBS WITHIN THE VARIOUS CATEGORIES OF DEFINED LOCATIONS. SUPPORT IS GIVEN TO THE IDENTIFICATION OF THE THREE SITES NORTH OF THE A4 BATH ROAD AS SHOWN ON MAP 2.4 AND THE INCLUSION OF THESE AS LOCALLY IMPORTANT EMPLOYMENT AREAS UNDER POLICY DME1.

POLICY E3 RECOGNISES THE SPLIT OF AIRPORT RELATED ACTIVITIES AS BEING CONTAINED WITHIN ITS CURRENT BOUNDARIES, AS THEY SHOULD BE, AND THOSE APPROPRIATE TO THE WIDER ECONOMY OUTSIDE THAT BOUNDARY.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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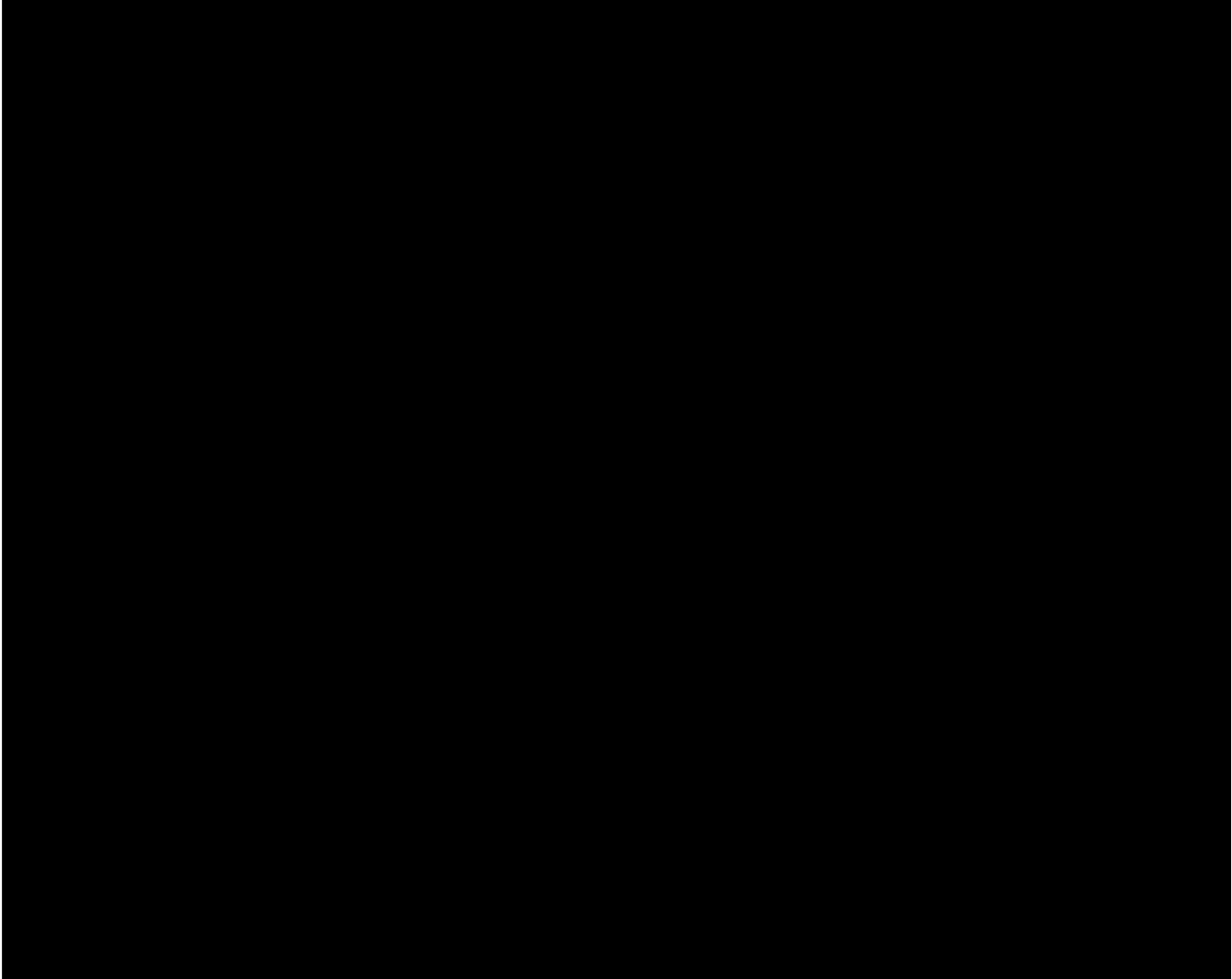
- **Email to:** localplan@hillingdon.gov.uk
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For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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Monitoring Questions

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Emerson Group Representation Re. Policy E2 and E3 including Map 2.4

The Group, who own several properties in the Heathrow area, would support the thrust of the above policies and are concerned regarding the proposed expansion of Heathrow Airport should the third runway be located next to Bath Road (A4) as one of the three schemes being considered by the Airports Commission. Already this has an impact on decision making by prospective tenants and increasing vacancy rates.

If the threat of the third runway north of the A4 recedes then the policy proposals in the Local Plan Part 2 are supported as is the indication on Map 5.1 of the area for growth of office and hotels lying north of the A4.

Policy E2 is a logical attempt to underpin the broad policies in the Core Strategy to accommodate the required 9000 jobs within the various categories of defined locations. Support is given to the identification of the three sites north of the A4 Bath Road as shown on Map 2.4 and the inclusion of these as Locally Important Employment Areas under Policy DME1

Policy E3 recognises the split of airport related activities as being contained within its current boundaries, as they should be, and those appropriate to the wider economy outside that boundary.



HILLINGDON

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PART A - Your Details (must be completed)

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1. Name and Address			
Title	MR		
First name	DAVID		
Last Name	SHORT		
Organisation (if relevant)	THE EMERSON GROUP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME3
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SUPPORT IS GIVEN TO POLICY DME3.
THE EMERSON GROUP SUPPORTS THE THRUST OF THIS POLICY RELATING TO OFFICE DEVELOPMENT AND ITS BROAD LOCATION.
SUPPORT IS GIVEN TO THE LIST OF EXCEPTIONS SET OUT IN DME3 (C) AND (D) WHERE IT CAN BE DEMONSTRATED THAT OTHER USES MAY BE APPROPRIATE IN THE CIRCUMSTANCES SET OUT IN THIS PART OF THE POLICY.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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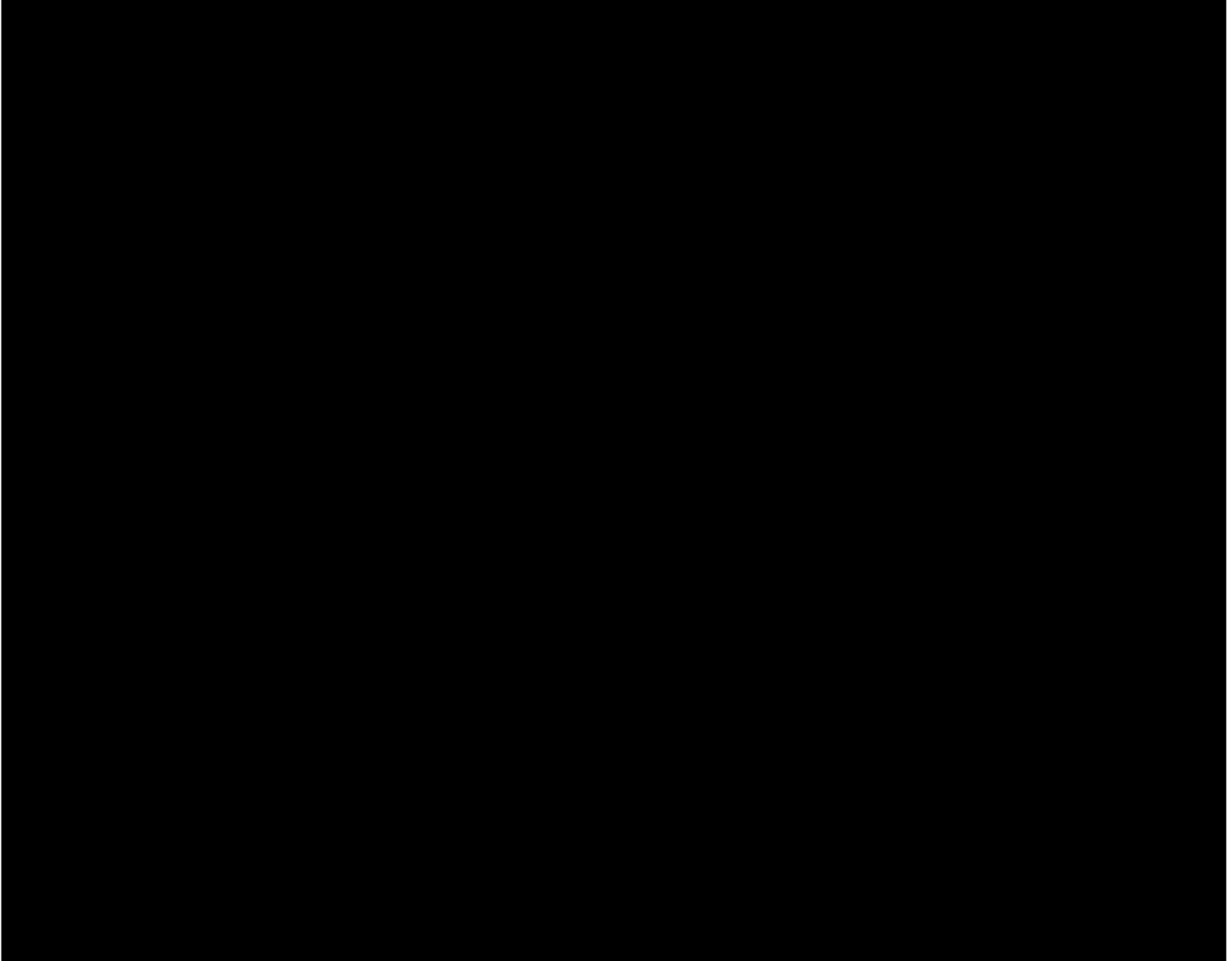
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For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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HILLINGDON

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PART A - Your Details (must be completed)

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1. Name and Address			
Title	MR		
First name	DAVID		
Last Name	SHORT		
Organisation (if relevant)	THE EMERSON GROUP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC3
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SUPPORT IS GIVEN TO POLICY DME3.

THIS POLICY IS BROADLY SUPPORTED THOUGH SOME CONCERN IS RAISED REGARDING THE CONTENT OF DMTC3(B) RELATING TO LOCAL PARADES. THE LIST OF LOCAL PARADES IN TABLE 1.2 COVER A RANGE OF LOCATIONS AND SIZES OF SMALL SHOPPING AREAS AND EACH WILL HAVE ITS OWN CHARACTERISTICS BASED ON THE LOCATION AND DEGREE TO WHICH IT IS SURROUNDED BY A CATCHMENT AREA AND HAS PASSING TRADE AND CONVENIENT CAR PARKING.

A FURTHER TEST SHOULD BE ADDED WHEREBY IF IT CAN BE DEMONSTRATED THAT MARKETING OF A VACANT UNIT HAS BEEN CARRIED OUT FOR 6 MONTHS OR, AT MOST, 1 YEAR WITHOUT SUCCESS THEN AN EXCEPTION CAN BE MADE TO DMTC3 (B ii).

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

A FURTHER TEST SHOULD BE ADDED WHEREBY IF IT CAN BE DEMONSTRATED THAT MARKETING OF A VACANT UNIT HAS BEEN CARRIED OUT FOR 6 MONTHS OR, AT MOST, 1 YEAR WITHOUT SUCCESS THEN AN EXCEPTION CAN BE MADE TO DMTC3 (B ii).

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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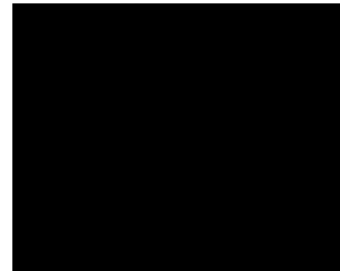
Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



2/

The Hillingdon Hospitals 
NHS Foundation Trust



15th October 2014

Ref: 23825-03-L-141014-Tippell.docx

Jales Tippell
Deputy Director Policy and Community Engagement
Resident Services
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middx UB8 1UW

Dear Ms Tippell

Publication of The Hillingdon Local Plan – Part 2

Thank you for your letter of 18th September informing us that the above is out for consultation.

As you are aware, my Trust operates two properties within the Borough that serve the health needs of its residents. We are operating under severe pressures with respect to demand for our services and financial restrictions and therefore in order to continually improve the quality of the services that we offer, our estate is constantly under review and new buildings being planned.

Securing planning permission can be a protracted and expensive process and we are keen to ensure that the policy framework that applies to our two main properties:

- Hillingdon Hospital on Pield Heath Road
- Mount Vernon Hospital in Northwood

are as supportive as possible to enable us to achieve the proposals that we have in mind.

The Trust has held several meetings, over the years, with you and your officers at which we have set out our initial thoughts for the future of both sites.

Nexus Planning (then Broadway Malyan) were present at those meetings and we have asked them to respond formally on our behalf to the three documents but would initially comment as follows:

Hillingdon Hospital

The Trust are committed to making significant investments in the building and operational content of this site. Work has started on a masterplan and we are committed to working with you to create a satisfactory framework for future planning applications. There are no site specific policies for the site and this is acceptable to us.

Mount Vernon

This site is owned by The Hillingdon Hospitals NHS Foundation Trust who manage it for a wide range of other healthcare providers including East and North Herts NHS Trust who operate the Cancer Treatment Centre. Parts of the site are not fully occupied and are potentially surplus.

We are disappointed that a number of policies that you are proposing would have a detrimental impact upon the Trust's proposals for this site:

- We consider that given the built up nature of the site and its relationship with the existing settlement area to the east that the northern area of the site should be excluded from the Green Belt.
- Paragraph 5.11, ref. SINC extension 13 of the Site Allocations and Designation document proposes that part of the northern area be designated as a Site of Importance for Nature Conservation. We consider that this is a wholly inappropriate designation and one which also undermines the redevelopment proposals that are being prepared for the site.

Work on a masterplan for the redevelopment of the site has commenced. It envisages that the surplus area of the northern area of the site be developed for housing. This will generate a capital receipt for the Trust to invest in other much needed building projects.

I feel that it is important to maintain a positive and open dialogue with Borough officers and members so that you fully understand our aspirations. We are keen to work with you so that we can enhance the quality of our services and so that you understand the pressures under which we are operating.

I would be very pleased to meet with you if this would assist.

Yours sincerely



Dr James Reid,
Interim Chair

- cc. Shane Degaris, THH
Steve Turner, THH
Adrian Keal, Nexus Planning
Nick Carver, East & North Herts NHS Trust
Stephen Posey, East and North Herts NHS Trust
Cllr Ray Puddifoot, Leader of the Council



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

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1. Name and Address	
Title	Mrs,
First name	Lesley
Last Name	Crowcroft
Organisation (if relevant)	Eastcote Conservation Panel
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit		House number
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME4, DHM6, DME15,
Paragraph Number; or	2.29,
Table or Figure Number; or	Two Inclusions for Atlas of changes. MOL One inclusion for Green Chain.
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

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(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Corrections and Omissions.

1. Development Management Policies [DMP] page 109 7.27. It is stated that there 14 Green Flags within the Borough. **There are 28** covering many different type of open spaces. In fact Hillingdon has the highest number of Green Flags in the Country.
2. **Site Allocations and Designations. Tables 2&3**
 - 216 Field End Road, Eastcote, Cavendish Ward 11 flats with 1 ground floor retail unit. Approved at appeal APP/R5510/A/11/2163550 **has been missed from the table.**
 - Initial House,150, Field End Road, Eastcote Cavendish Ward the number of dwellings has been increased from **42 to 45**
 - Former RAF Eastcote Eastcote/East Ruislip Ward. Now known as Pembroke Park. The initial approved planning consent was for 385 dwellings as shown on the table. However there have been numerous applications since to increase the density which I believe is now around **400** dwellings.[There have been so many applications refusals and appeals I have lost count, hopefully the Planning Dept can help here]

Tourism and Visitor Facilities

Document Development Management Policies. Section 2 The Economy

2.29 lists possible visitor attractions. This section should be enhanced to give examples of Heritage sites, especially those recently restored with funding from the Heritage Lottery Fund. There are two sites within Eastcote/East Ruislip Ward.

1. Manor Farm Ruislip Grade II listed complex with the Great Barn one of the largest remaining in the area, Ancient Monument –Motte & Bailey, mentioned in the Domesday Book.
2. Eastcote House Gardens, currently undergoing restoration, Grade II listed Stables Dovecote and Walled Garden. Listed as a Garden of Excellence. The Dovecote is the only remaining Dovecote in Middlesex in public ownership. The Walled Garden, surrounding gardens and park land, with the link to Long Meadow[Northwood Hills Ward], a Conservation site will attract many visitors. The restoration project includes a new building to house a Tea room. Visiting excellent gardens is now a growing past time.

Both Manor Farm & Eastcote House Gardens have Green Flags. London in Bloom 2014, Category Park of the Year, Eastcote House Gardens was Gold and category winner. Long Meadow Category Conservation Area was awarded Silver Gilt and category winner. Both sites are linked by the Celandine Route, a 13 mile walk along the Pinn Meadows.

2.29 last bullet point to read Many historic features including Ancient Monuments, Grade II listed buildings, gardens, inns, barns and churches.

Policy DME4: Visitor Attractions. Should also includeThe Council will take steps to encourage visitors to Heritage sites.

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Further representations attached on separate sheet.

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<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

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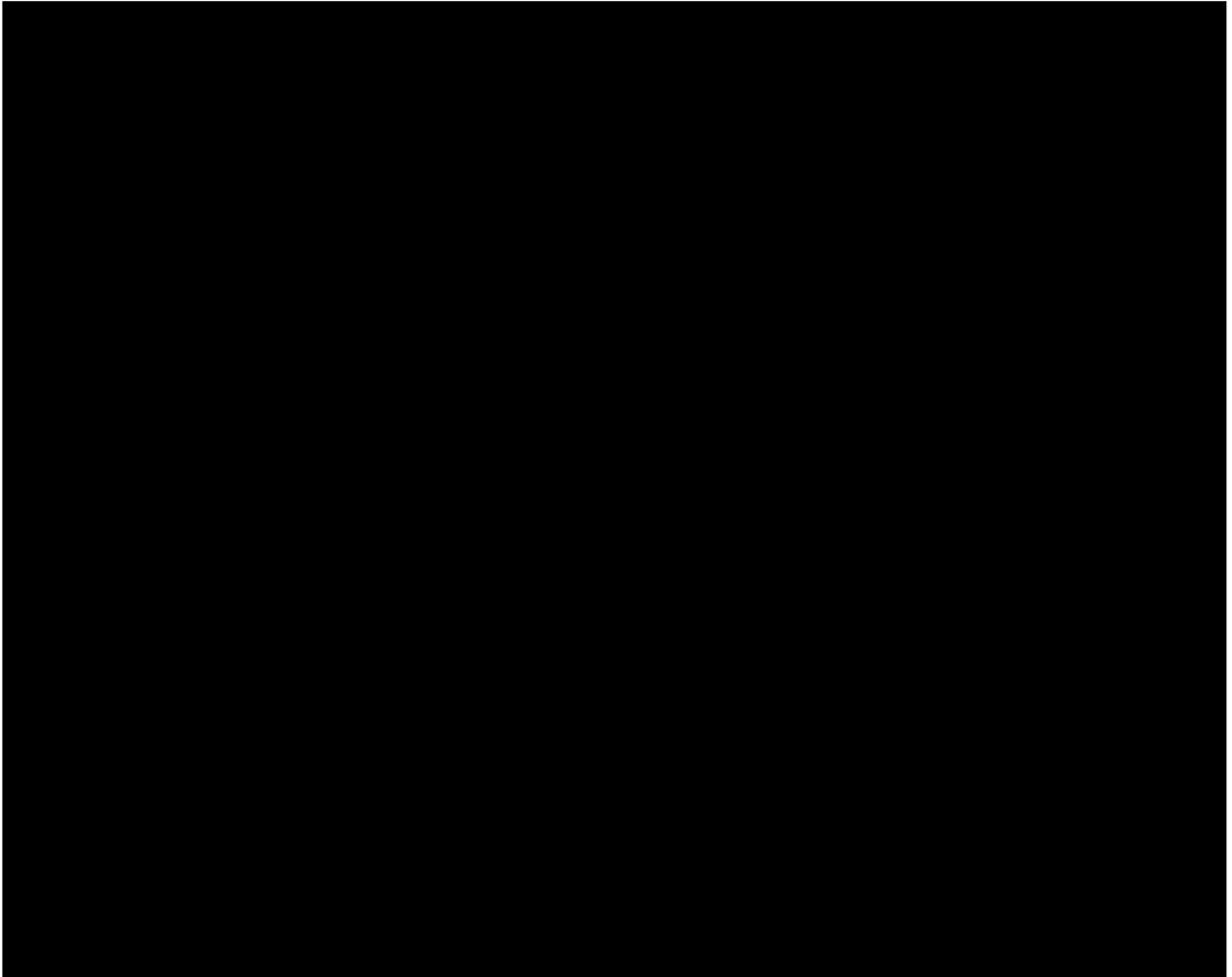
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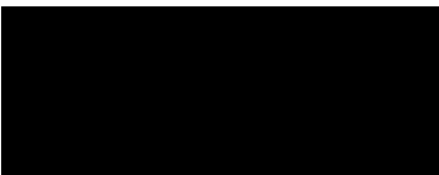
All forms must be received by the Council by 5pm 4th November 2014.

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**Lesley Crowcroft
Eastcote Conservation Panel**



Continuation Sheet. Question 6.

Development Management Policies.

4.16 and Policy DMH6. Garden and Backland Developments.

The wording of section 4.16 and Policy DHM6 should be changed to reflect the wording of the NPPF 53 which is as follows:-

53. NPPFLocal planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.....

So rather than referring to back gardens or backland development the policy DMH6 and 4.16 should omit the word 'back'. Planning applications to develop side and front gardens are often submitted. Development of side gardens can drastically alter the appearance and cause harm to the local area.

By making the wording less ambivalent these unsuitable applications will become easier to resist.

Policy DMH6 There is a presumption against the loss of residential gardens due to the need to etc.

Site Allocations and Designations. Green Chain, MOL, Green Belt.

Upgrading of Green Chain to MOL.

River Pinn Green Chain.

The Eastcote Conservation Panel welcomes the extra status of MOL given to the many water meadows along side the River Pinn, Cheney Field, Long Meadow, Kings College Playing Fields etc. However, the Green Chain designation does recognize more fully the biodiversity and nature conservation value of these areas.

LBH Landscape Character Assessment does draw attention to the fragility of the River Pinn corridor with the urbanization of many stretches of the River and the narrowness of the land either side of the river.

The Conservation Panel asks that the Pinn Meadows, which form the Celandine Route, link the Heritage sites Manor Farm Ruislip with Eastcote House Gardens, keeps Green Chain designation alongside MOL designation. This dual designation will afford this area as much protection against inappropriate development as possible.

The wording of Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Hillingdon Local Plan part 1, was approved by the Planning Inspectorate during the examination of this document.

However, Policy DME15 Development in Green Chains has a slight change in the wording making the policy appear less robust than Policy EM2. To keep continuity between the two parts of the Hillingdon Plan the wording of DME15 should echo that

of Policy EM2. The Conservation panel requests that the wording of policy DME 15 be the same as Policy EM2.

Request Inclusion into Green Chain Category. Policies Map Atlas of Changes.

Parkway open space linked to Colombia Avenue Open Space by railway embankment. Ruislip

This area gives a clear break in the urban fabric.

The two open spaces have recreational value, being situated in densely populated areas.

The railway embankment link provides a wild life corridor.

For the reasons given above the Eastcote Conservation Panel requests that this area be given Green Chain Status.

Metropolitan Open Land extra inclusions for Policies Map Atlas of Changes

Re status of the Bessingby/Cavendish/Pine Gardens Park complex. [Cavendish Ward]

Request that the status of these parks be upgraded to Metropolitan Open Land.

The wards of Cavendish and Eastcote/East Ruislip have some of the highest density of population in the London Borough of Hillingdon.

This is currently rapidly expanding with the development at Pembroke Park [formerly RAF Eastcote] in Eastcote/East Ruislip ward. Initial House 150, Field End Road and 216 Field End Road both in Cavendish Ward.

In the section of the HLP Site Allocations and designations the following areas have been proposed for future development pages [14/ 15.] 269-285 Field End Road Cavendish Ward, Royal Mail Sorting Office, Manor Ward, Industrial site Braintree Road South Ruislip and the Site near Odyssey Business Park South Ruislip Ward. Although not all of these designations are within Cavendish Ward, they are nearby and future residents will use the facilities afforded at B/C/PG parks.

The Bessingby/Cavendish/Pine Gardens complex is a valuable asset to this densely populated area

The criteria for designating a site MOL is as follows.

1. Providing a clear break in the urban fabric and contributing to the green character of London.
2. Including open air facilities serving the leisure, recreational, sports, arts and cultural needs of Londoners outside their local area.
3. Containing a feature of historic, recreational or biodiversity value of national or regional significance.

Within this park complex with Green Flag Status, there are many sports groups, football, bowls, cricket, tennis, some of whom play in competitions which bring visitors from other parts of London.

By its size the complex gives a much needed break in the urban fabric. Cavendish/Pine Gardens, are designated as a Site of Importance for Nature Conservation [SINC]. Cavendish Pavilion is Locally Listed, and has historic significance.

The Hillingdon Open Space Strategy also noted that areas of Cavendish and Eastcote/East Ruislip wards are lacking in open space per capita of the population, which should be increased. South Ruislip Ward is noted to be lacking in accessible play space. With the proposed developments listed above there will be a great increase in the local population thereby increasing the need for more accessible play areas, leisure facilities and open space.

These circumstances make the Bessingby Complex very important to the local and wider area.

The Eastcote Conservation Panel request that MOL status be given to Bessingby/Pine Gardens/Cavendish parks.

**Re Warrender Park and Highgrove Woods. [Eastcote /East Ruislip Ward]
Request that these areas are upgraded to Metropolitan Open Land.**

In the section of the HLP Site Allocations and designations the following areas have been proposed for future development pages [14/ 15.] 269-285 Field End Road, Royal Mail Sorting Office, Manor Ward, Industrial site Braintree Road South Ruislip Ward, Land near Odyssey Business Park, South Ruislip Ward. There are not any large developments foreseen for Eastcote/East Ruislip Ward, however the proposals mentioned above and the nearing completion of Pembroke Park, the former RAF Eastcote site will impact upon E/ER. Developments such as 150 Field End Road [Initial House] sits on the border between Cavendish and E/ER wards, therefore, will impact on E/ER Ward.

Warrender Park and Highgrove Woods are very valuable assets in this densely populated area.

The criteria for designating a site MOL is as follows.

1. Providing a clear break in the urban fabric and contributing to the green character of London.
2. Including open air facilities serving the leisure, recreational, sports, arts and cultural needs of Londoners outside their local area.
3. Containing a feature of historic, recreational or biodiversity value of national or regional significance.

Highgrove Woods, a Site of Importance for Nature Conservation, was awarded Silver Gilt and category winner for a Conservation Area in London in Bloom 2014. Warrender Park, Green Flag holder and was awarded Silver Gilt for Park of the Year London in Bloom 2014, These are the nearest open spaces for Pembroke Park, Warrender Park now has many improved sporting facilities, and is used widely by Bishop Ramsey School, which has a large catchment area and is not confined to Eastcote & Ruislip.

Both Warrender Park and Highgrove Woods, are historically interesting, being part of the former Warrender Family Estate, Highgrove House is still a residential property. [Winston Churchill stayed at Highgrove House during WWII]

The Hillingdon Open Space Strategy also noted that areas of Cavendish and Eastcote/East Ruislip wards are lacking in open space per capita of the population, which should be increased.

These two areas are a much needed break in the urban fabric, serving leisure pursuits and have great conservation biodiversity value.

Eastcote Conservation Panel request that these two areas are given Metropolitan Open Land status.



Department
of Health

Your ref: JT.lp-007.Sep14
Our ref: TO00000888088

James - pl amend
contact details

DOCUMENT
RECEIVED
10 OCT 2014
SCANNED

Thank
Jales



Ms Jales Tippell
Residents Services
3N/02 Civic Centre
High Street
Uxbridge UB8 1UW

08 OCT 2014

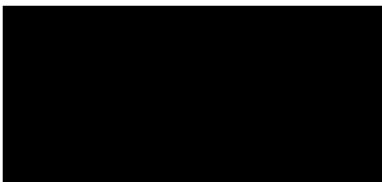
Dear Ms Tippell,

Thank you for your letter of 18 September to the Department of Health about the London Borough of Hillingdon Local Plan Part 2. I have been asked to reply.

The role of the Department of Health is to provide strategic leadership to the NHS and social care organisations in England. NHS England is responsible for the commissioning side of the NHS in England as set out in the Health and Social Care Act 2012. In view of this, your correspondence has been passed to the NHS England London Area Team as it is best placed to respond.

For further information, you may wish to contact the London Area Team direct. The contact details are:

London Area Team



Telephone:

I hope this reply is helpful.

Yours sincerely,



Sarah Harrison
Ministerial Correspondence and Public Enquiries

Our ref: J/Planning/JO32063

Your ref:



Sent by email only to: localplan@hillington.gov.uk

Planning Policy Team,
London Borough of Hillingdon,
3N/02 Civic Centre,
High Street,
Uxbridge,
Middlesex , UB8 1UW

31 October 2014

Dear Sir/Madam,

Local Plan Part 2: Site Allocations and Designations

Representations by Dairy Crest Limited

We act on behalf of Dairy Crest Limited in respect of the current Local Plan Part 2: Site Allocations and Designations Consultation which closes on the 4 November 2014. Our client has a freehold interest in the Dairy Crest Depot, 297-299 Long Lane, Hillingdon ("the Site") with the accompanying site location plan confirming the extent of the site.

The Site is included within the emerging Local Plan Part 2 as a site (Policy SA 20) suitable for residential led development. The consultation document details that the Site has an estimated capacity of up to 25 residential dwellings.

Site and Existing Operations Overview

The main Site is currently in use as a Dairy Crest depot with there being an existing vehicular access to the Site from Long Lane. As can be seen from the attached aerial images of the Site below (**Appendix A**), the Site is largely covered by existing commercial buildings, with single-storey buildings abutting the east, north and west shared boundaries of the Site.

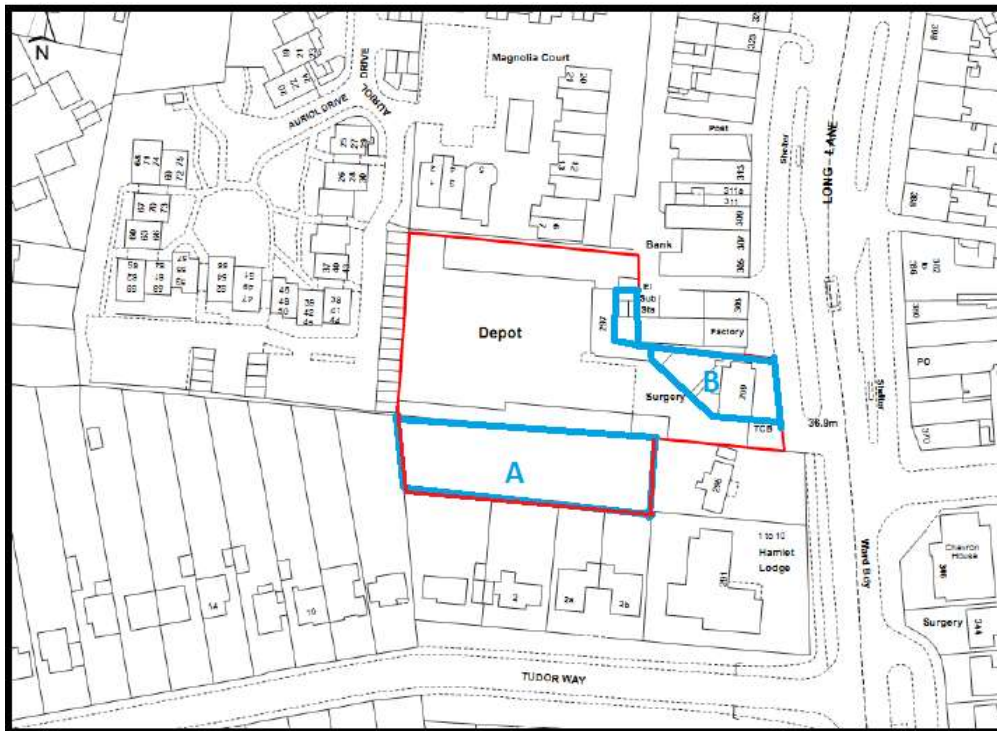
It is important to note that the emerging allocation includes two parcels of land that are not within our Client's demise. The extent of these parcels of land is illustrated within Figure 1 below, with Parcel 'A' being a rectangular parcel of land that was previously part of the residential curtilage of No.295 Long Lane (which has no access) and Parcel 'B' being No.299 Long Lane which accommodates two commercial units, which are currently in use as a dentist and hairdressers.

The Dairy Crest depot is currently operating with 20 residential rounds, managed with an Operations Manager and 23 staff. This represents an underutilisation of the site which could operate up to 39 rounds (42 employees) if the business were available.

Due to continuing customer decline however, it is now important to consolidate this site with others, with this reflecting Dairy Crest's wider operational approach. Initially internal consolidation has occurred at the site with individual delivery rounds merging, with this requiring a move away from electric vehicles to Transit type which have a longer range. Dairy Crest has subsequently recently completed a detailed operational review and the output of this has been that there is an identified need to merge the Watford, Hillingdon and Welwyn depots into one site, most likely to be in Watford. Dairy Crest could then continue to serve customers

effectively and run the business on a more profitable footing. This approach would replicate a model shown most recently at Camberley where a new location was opened to combine four local depots.

Figure 1: Annotated Location Plan



Planning Representations

Principle of Allocation

We welcome the allocation of the Site for residential led development as part of emerging Policy SA 20 and can confirm that it is envisaged that the Site will come forward for redevelopment in the short term, with the indicative phasing of 2016-2021 within the policy text being supported.

Site Ownership

Our client's Site forms the majority of the allocation, with the demise illustrated within the accompanying site location plan. As detailed above within Figure 1, the emerging site allocation also includes two parcels of land that are not within our client's demise. Parcel 'B' (No.299 Long Lane) represents an existing retail frontage onto Long Lane and it is considered that any future redevelopment options on our client's land would be compatible with this site.

It is however considered that the inclusion of the land identified as Parcel 'A' as part of the emerging site allocation would stifle any future development of our client's Site. The intentions of this landowner are currently unknown and given the very modest size of this site (with existing constraints) it is viewed that there is little opportunity or merit of a comprehensive scheme coming forward on both parcels of land. In the absence of such an approach, it is viewed that the retention of the land is only likely to frustrate any future development on our client's Site.

The parcel of land in question ('A') is a very narrow plot (approximately 15m) and backs directly onto the rear gardens of residential properties on Tudor Way, with there only being a minimal separating distance of approximately 11m between the site boundary and rear windows of No.s 2a & 2b Tudor Way. Similarly there

is a very minimal separating distance between the site boundary to the east of this land and the rear windows of No.295 Long Lane, as is apparent from the aerial images below (**Appendix 1**). It is also noted that the Site does not benefit from an existing vehicular access and would be solely reliant on utilising our client's land.

The parcel of land is heavily landscaped with a number of mature trees located on the land, with this being representative of the fact that it was formerly part of the residential curtilage of No.295 Long Lane. It is viewed that any residential development on this piece of former residential curtilage would be likely to conflict with both adopted and emerging (Policy DMH6 of Development Management Policies) planning policy on backland development. This view is made on the basis that the land contributes as part of a swathe of green space for the surrounding residential properties. As detailed above there is also insufficient separation distances to allow for residential units to be positioned on the land, without impacting detrimentally on the amenity of the existing residential properties to the south and in conjunction this heavily restricts any development opportunities on this piece of land. It is noted that planning permission was refused in 1998 (LPA reference: 53596/98/2447) for the development of this land for residential purposes.

If it was necessary to factor in the potential development of the land to the south (Parcel 'A') as part of a future planning application on our client's Site in a non-comprehensive form (i.e. two development sites), this would render a large percentage of the main Site (our client's demise) as undevelopable, as it would be likely that there would need to be a large set-in from the shared south boundary. Such an approach would make a very inefficient use of the Site, failing to maximise housing delivery. Policy SA 20 defines that it will seek to achieve up to 25 residential units on the Site, however, and as above, we are of the opinion that this figure would in reality be substantially lower if Parcel 'A' is retained within the allocation.

Given that the land identified as Parcel 'B' is existing developed land, we have no objections to the inclusion of this land as part of the wider site allocation. We would however comment that the policy requirement for the retention of health care facilities is only relevant for this parcel of the land, with no health care facilities being located within the main parcel of the Site (our client's land).

Conclusions

It is therefore concluded that the land to the south of our client's Site (Parcel 'A') would not be suitable for residential development and to maximise the development opportunities of the wider Site, it should not be retained as part of Policy SA 20. This would ensure that a higher density development could come forward on our client's land in the short term, which in turn would provide a valuable supply of local housing within this sustainable location.

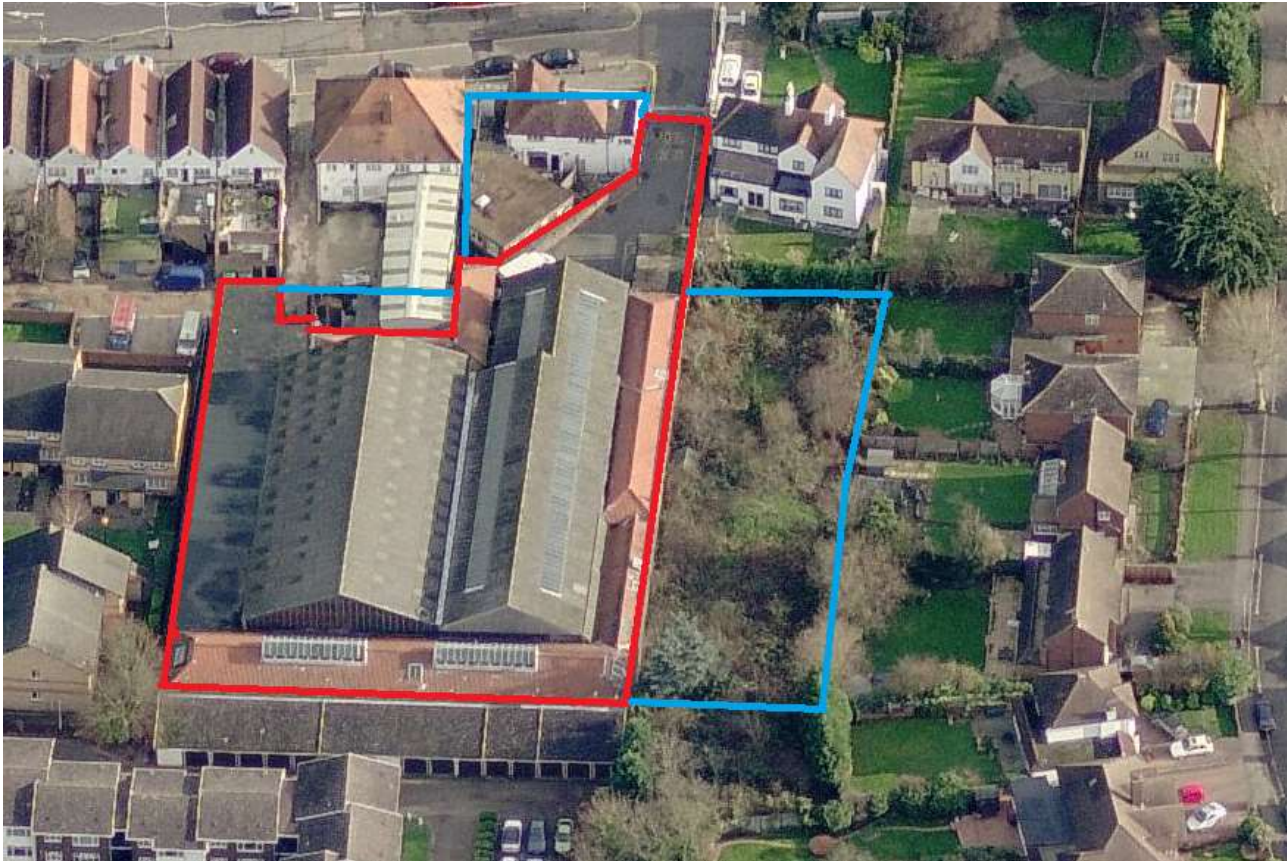
It would be appreciated if you can please confirm receipt of this letter and should you have any queries or require further information please contact Alex Christopher [redacted] or [redacted] of this office in first instance.

Yours sincerely



GL Hearn

Appendix 1: Aerial Map Extracts (source: Bing Maps)



H. M. LAND REGISTRY GENERAL MAP

GREATER LONDON
MIDDLESEX

SHEET
NATIONAL GRID

TQ 0784

SECTION E

Scale 1/1250



NW
NE

Old Reference XIV 4 P



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General of the Ordnance Survey,
Chessington, Surrey, 1964 for HMLR
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Filed Plan of Title No. NGL 68518

This is a print of the view of the title plan obtained from Land Registry showing the state of the title plan on 05 August 2008 at 10:08:48. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground. See Land Registry Public Guide 19 - Title Plans and Boundaries.

This title is dealt with by Land Registry, Swansea Office.

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Residents Services

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



Date: 31/10/2014

Ref: 23825/06

Dear Sir/Madam

Representations to the London Borough of Hillingdon Local Plan Part 2 (Reg 19)

I write on behalf of my clients:

The Hillingdon Hospitals NHS Foundation Trust
East and North Hertfordshire NHS Trust

and enclose hard copies of the representations that we have submitted on their behalf with respects to the London Borough of Hillingdon Local Plan Part 2 (Reg 19).

There are 7 representations in total from each Trust and these relate to the three documents prepared by the Council. The representations comprise the following:

Development Management Policies

Rep 1: Changing the wording of paragraph 6.16

Rep 2: Inconsistency of paragraph 4.3

Site Allocations and Designations

Rep 3: Paragraphs 3.1 and 3.2 Housing Numbers

Rep 4: Table 3.2 Housing Site Allocation

Rep 5: Paragraph 5.1- 5.10 removal of Mount Vernon Hospital site from the Green Belt.

Rep 6: Table 6.1 SINC Extension

Policies Map (Atlas of Changes)

Rep 7: Atlas of Changes Part 3- Changes to the status of Mount Vernon Hospital.

Should you have any questions in relation to any of the representation enclosed please do not hesitate to get in touch with myself or my colleague Adrian Keal.

Yours sincerely,

Lance Flannigan

Director of Planning

cc: Steve Turner The Hillingdon Hospitals NHS Foundation Trust
Wendy Walker East and North Hertfordshire NHS Trust
Adrian Keal Nexus Planning





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	
House name	<input type="text"/>		
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	6.16
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of The Hillingdon Hospital NHS Foundation Trust ("The Trust"). The Trust is responsible for delivering acute healthcare services across a wide geographical area including the London Borough of Hillingdon.

The NPPF in paragraph 182 states that in order for a Local Plan to be found sound it needs to be consistent with national policy and should enable delivery of sustainable development in accordance with the policies in the Framework.

Paragraph 6.16 of the Local Plan Part 2: Development Management Policies states "Dwellings are inappropriate development in the Green Belt and Metropolitan Open Land but where they exist, alterations and extensions will be acceptable, provided they do not result in disproportionate additions over and above the size of the original buildings".

However Paragraph 89 of the NPPF confirms that although a local planning authority should regard the construction of new buildings as inappropriate in Green Belt, there are a number of specific exceptions to this, including the following:

" limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."

It should be noted that this specific exception is silent as to the proposed use of the site following infilling or its partial or complete redevelopment and so does not preclude the possibility of dwellings or residential developments being considered appropriate development in accordance with Paragraph 89. This is clearly the case, since where Paragraph 89 does not intend for dwellings or residential development to qualify as an exception, it clearly states so (see for example, the exception relating to the replacement of a building).

For this reason it is concluded that Paragraph 6.16 as currently drafted does not comply with the NPPF and is therefore unsound.

Furthermore, we note that the exceptions set out in paragraph 89 are reproduced in paragraph 6.14 of the Local Plan Part 2 and so paragraph 6.14 and 6.16 are not consistent with one another.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

In order for the Local Plan Part 2 to be found sound in line with the NPPF we propose the following changes to paragraph 6.16:

"New dwellings are inappropriate development in the Green Belt and Metropolitan Open Land unless they qualify as one of the exceptions outlined in paragraph 89 of the NPPF. Where dwellings already exist, alterations and extensions will be acceptable, provided they do not result in disproportionate additions over and above the size of the original building."

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	
House name	<input type="text"/>		
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
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Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	4.3
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of The Hillingdon Hospitals NHS Foundation Trust (" The Trust "). The Trust is responsible for delivering acute healthcare services across a wide geographical area including the Borough of Hillingdon.

Paragraph 4.3 states that the Local Plan Part 2 – Site Allocations and Designations document identifies specific sites for residential development to provide 5 years' worth of housing supply.

This statement is inaccurate and misleading. Furthermore, it is not consistent with the NPPF, the development plan for Hillingdon (the London Plan and the Local Plan Part 1), Paragraphs 3.1 to 3.9 of the Site Allocations and Designations document and the emerging Draft Further Alterations to the London Plan (January 2014), which is likely to become part of the development plan for Hillingdon before the Local Plan Part 2 is adopted.

In this regard, it should be noted that the Draft Further Alterations to the London Plan (January 2014) have been submitted to the Secretary of State and are currently the subject of Public Examination. The submitted Further Alterations to the London Plan include revised housing provisions which increase the minimum targets for the Boroughs and roll these forward to cover the period 2015 to 2025. In Hillingdon ' s case, the proposed increase in the minimum annual average housing target is from 425 to 559 dwellings per annum over the period 2015 to 2025, rolled forward to the end of the Local Plan period, ie. 2026.

On this basis, if the submitted Draft Further Alterations to the London Plan are adopted as currently proposed, the minimum housing target for the period of the Hillingdon Local Plan 2011-2026 will be modified as follows:

- i) 425 dwellings per annum over the period 2011-2015 (4 years) = 1,700 dwellings
- ii) 5 dwellings per annum over the period 2015-2026 (11 years) = 6,149 dwellings

- iii) Total for the plan period 2011-2026 (15 years) = 7,849 dwellings

As stated above, the Draft Further Alterations to the London Plan are at a more advanced stage than the Hillingdon Local Plan Part 2 and are likely to be adopted to form part of the up to date development plan for Hillingdon before the adoption of the Local Plan Part 2.

If this is the case, in accordance with Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the NPPF, it will be necessary to make changes to the Hillingdon Local Plan Part 2, including changes to Paragraphs 3.1 and 3.2, to ensure that it is consistent with the up to date development plan. For the same reasons, it will also be necessary to undertake a partial review of the Local Plan Part 1, including changes to Policy H1 and the explanatory text.

Please continue on a separate sheet if necessary

In addition, Paragraph 3.2 states that the Site Allocations and Designations document identifies specific sites to meet housing delivery targets in the short term (2011-2016) and medium term (2016-2021), whilst broad locations for residential development in the last 5 years of the plan are identified. However, whilst this approach to phasing the delivery of new dwellings appears to be consistent with the advice set out in Paragraph 47 of the NPPF, we do not believe this to be the case.

In summary, Paragraph 47 requires LPA's to ensure that their Local Plan meets the housing needs of the area, identify and update annually a supply of specific deliverable sites to provide 5 years worth of housing, and to identify a supply of specific, developable sites for years 6-10 and, where possible, for years 11-15.

On the basis that the 5 year housing land supply is required to be updated annually, ie. rolled forward, it is logical that the same should be done for the supply of sites for years 6-10 and, where possible, for years 11-15. If this is not the case, then a situation would arise where, on the first anniversary of the Local Plan, the LPA could only need to identify specific developable sites for years 7-10 and so on, until the point is reached on the 5th anniversary of the plan that the LPA is not required to identify any sites or broad locations to meet medium term housing land supply. Clearly, this cannot be the intention of Paragraph 47.

Therefore, in order to be consistent with Paragraph 47, we suggest that Paragraph 3.2 of the Local Plan Part 2 is amended to make it clear that the Site Allocations and Designation document identifies housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption.

If it is assumed that the Local Plan Part 2 is adopted in 2015, this will mean that the provisions of the Site Allocations and Designations document relating to the phasing of housing delivery will need to be rolled forward to identify sites to meet the housing targets for the short term (2015-2020) and medium term (2020-2025). Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 will need to be amended accordingly, to set out clearly the housing supply position at the date of Local Plan Part 2 adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In order for the Local Plan Part 2 to be found sound there are a number of necessary changes.

The suggested changes are set out in our main representations set out in question 5 see above.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The housing provision of the Local Plan Part 2 are fundamental to its soundness and the Trust wishes to ensure that necessary and appropriate changes are made.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

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Title			
First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	
House name	<input type="text"/>		
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

PART B - Your responses:

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(please tick relevant box)

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<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraphs 3.1 and 3.2
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

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These representations have been prepared by Nexus Planning Limited and are submitted on behalf of The Hillingdon Hospitals NHS Foundation Trust (" The Trust "). The Trust is responsible for delivering acute healthcare services across a wide geographical area including the Borough of Hillingdon.

Paragraphs 3.1 and 3.2 of the Site Allocations and Designations document have been drafted to accord with the development plan for Hillingdon and, as a result, state that the identification of sites for new homes has been undertaken in the context of Policy H1 of the Local Plan Part 1. In turn, Policy H1 provides for a minimum of 6,375 new dwellings to be delivered over the period of the Hillingdon Local Plan (2011/2026) and for sites that contribute to the achievement of this target to be identified in the Hillingdon Local Plan Part 2 – Site Specific Allocations LDD.

In turn, Policy H1 of the Local Plan Part 1 has been based upon the housing provisions of the London Plan (2011) which at Policy 3.3 states that housing delivery should meet or exceed the minimum annual average housing target for each Borough. In Hillingdon ' s case, the target is 425 new dwellings per annum, which over the 10 year period of the London Plan (2011-2021) equates to a minimum target of 4,250 new dwellings. Policy 3.3 goes on to state that, where a target beyond 2021 is required, the average annual target should be rolled forward to cover the period of the Local Plan until it is replaced by a revised London Plan target.

In this regard, it should be noted that the Draft Further Alterations to the London Plan (January 2014) have been submitted to the Secretary of State and are currently the subject of Public Examination. The submitted Further Alterations to the London Plan include revised housing provisions which increase the minimum targets for the Boroughs and roll these forward to cover the period 2015 to 2025. In Hillingdon ' s case, the proposed increase in the minimum annual average housing target is from 425 to 559 dwellings per annum over the period 2015 to 2025, rolled forward to the end of the Local Plan period, ie. 2026.

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Please continue on a separate sheet if necessary

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In summary, Paragraph 47 requires LPA's to ensure that their Local Plan meets the housing needs of the area, identify and update annually a supply of specific deliverable sites to provide 5 years worth of housing, and to identify a supply of specific, developable sites for years 6-10 and, where possible, for years 11-15.

On the basis that the 5 year housing land supply is required to be updated annually, ie. rolled forward, it is logical that the same should be done for the supply of sites for years 6-10 and, where possible, for years 11-15. If this is not the case, then a situation would arise where, on the first anniversary of the Local Plan, the LPA could only need to identify specific developable sites for years 7-10 and so on, until the point is reached on the 5th anniversary of the plan that the LPA is not required to identify any sites or broad locations to meet medium term housing land supply. Clearly, this cannot be the intention of Paragraph 47.

Therefore, in order to be consistent with Paragraph 47, we suggest that Paragraph 3.2 of the Local Plan Part 2 is amended to make it clear that the Site Allocations and Designation document identifies housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption.

If it is assumed that the Local Plan Part 2 is adopted in 2015, this will mean that the provisions of the Site Allocations and Designations document relating to the phasing of housing delivery will need to be rolled forward to identify sites to meet the housing targets for the short term (2015-2020) and medium term (2020-2025). Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 will need to be amended accordingly, to set out clearly the housing supply position at the date of Local Plan Part 2 adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The suggested changes considered necessary to make the Local Plan Part 2 sound are set out in our main representation set out in question 5 above.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The housing provision of the Local Plan Part 2 are fundamental to its soundness and the Trust wishes to ensure that necessary and appropriate changes are made.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	<input type="text"/>
House name	<input type="text"/>		
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 3.2
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of The Hillingdon Hospitals NHS Foundation Trust (" The Trust "). The Trust is responsible for delivering acute healthcare services across a wide geographical area including the Borough of Hillingdon.

Acute care is primarily provided at two locations within the Borough, namely at The Hillingdon Hospital and the Mount Vernon Hospital sites, which are owned by the Trust. The Mount Vernon Hospital site is also occupied by the Cancer Care Treatment Centre run by the East and North Herts NHS Trust along with a range of health care facilities run by private and charitable operators including Michael Sobell House Hospice, Paul Strickland Scanner Centre and Baxters Healthcare, mainly associated with the treatment of cancer. Bishops Wood Hospital is a private hospital to the north of the Site. As a result the Mount Vernon Hospital site provides a range of health care services and has an important strategic role serving North West London and Hertfordshire, which goes beyond Hillingdon's administrative boundaries.

As part of its role as a health care provider, the Trust has a duty to plan for the future delivery of acute health care services and consequently is seeking changes to the Hillingdon Local Plan to enable it to make appropriate provision of healthcare facilities in the future/over the long term. The Trust's plan to provide improved and expanded health care services to meet the needs of its catchment population is supported by an estates strategy for the provision of new facilities. The Mount Vernon Hospital site represents a significant opportunity to meet the long term needs of the Trust and other occupiers.

A plan identifying the Mount Vernon Hospital Site and adjoining land owned by the Trust is attached in Appendix 1 of these representations.

To ensure that the Trust's aspirations of future development at the Mount Vernon Hospital site can be delivered the Trust is seeking to secure a number of changes to the Hillingdon Local Plan part 2 in relation to the Mount Vernon Hospital site, to include:

- i. the removal of land from the Green Belt
- ii. the allocation of (part of the) land for housing
- iii. exclusion of land from the proposed extension of the Site of Grade 1 Nature Conservation Importance

In accordance with the NPPF, (i) above can only be achieved through the preparation or review of the local plan. The NPPF requires a demonstration of exceptional circumstances to justify such removal.

The Trust considers that exceptional circumstances exist in relation to the Mount Vernon Hospital site. Its case consists of a number of interrelated factors which in combination provide the necessary justification for removal of land from the Green Belt. Its exceptional circumstances case requires representations to be made in relation to different parts of the Hillingdon Local Plan part 2 (proposed submission version) and the representations set out below should be considered accordingly.

Please continue on a separate sheet if necessary

To assist in the achievement of the Trust's aspirations for future development at the Mount Vernon Hospital site and to provide the necessary certainty, the Trust proposes that land at the site is identified as a housing site in the Site Allocations and Designations document and is included in the list of allocated housing sites at Table 3.2 for delivery in the short term, ie. within 5 years following the date of adoption.

The extent of the site proposed to be allocated for new housing is shown coloured yellow on the plan at Appendix 2. The site area is 5.4ha hectares and based on a range of factors, including its location and accessibility, has the capacity to deliver sustainable development of approximately 170 dwellings.

The planning justification for the proposed housing site allocation is as follows:

- i) It represents a key element of the Trust's proposals for the sustainable, healthcare led development of the Mount Vernon Hospital site for which there is a demonstrable need, which in turn can only be achieved by securing the site's release from the Green Belt.
- ii) The proposed housing development forms part of the exceptional circumstances case put forward by the Trust to secure the release of land at the Mount Vernon Hospital site from the Green Belt. In short, the Trust's plans for sustainable development on the site rely upon funding and the capital receipt from the proposed housing development represents a substantial part of this funding.
- iii) The proposed housing site is considered suitable and its development will contribute towards meeting and exceeding the minimum housing requirement for Hillingdon in accordance with the provisions of modified Policy 3.3 and the increased housing target for Hillingdon set out in the Draft Further Alternations to the London Plan (January 2014).
- iv) The proposed housing will be part of an integrated mixed use development which will make efficient and effective use of land which is already substantially developed but significantly under-utilised and will achieve significant net gains across the economic, social and environmental dimensions of sustainable development.
- v) With the exception of a small area situated in the eastern part of the proposed housing site, all of the land included within the proposed housing site allocation is classified as previously developed land and its immediate curtilage.
- vi) The exceptions to inappropriate development in the Green Belt identified in paragraph 89 of the NPPF do not preclude the redevelopment of previously developed land for residential use.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

In order for the Local Plan Part 2 to be Sound, the Trust considers that it is necessary to allocate the land at the Mount Vernon Hospital Site identified on the map at Appendix 2 to these representations as a housing site for delivery in the first five years following the date of adoption.

To secure the allocation it will be necessary to include the site in the list of allocated housing sites at table 3.2 and a new site allocation policy for land at the Mount Vernon Hospital Site in the Site Allocations and Designations Document. It will also be necessary to identify the site on the Policies Map (Atlas of Changes) as a housing site.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The allocation of land at the Mount Vernon Hospital Site for housing is fundamental to the delivery of the Trust's plans for future development at the Site and improved healthcare provision to serve Hillingdon and the wider area.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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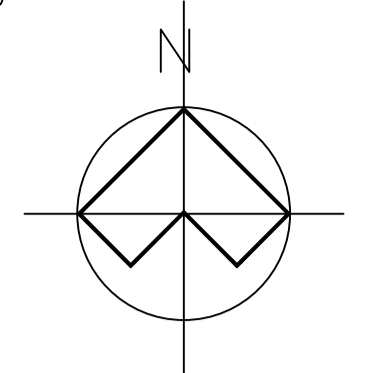
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

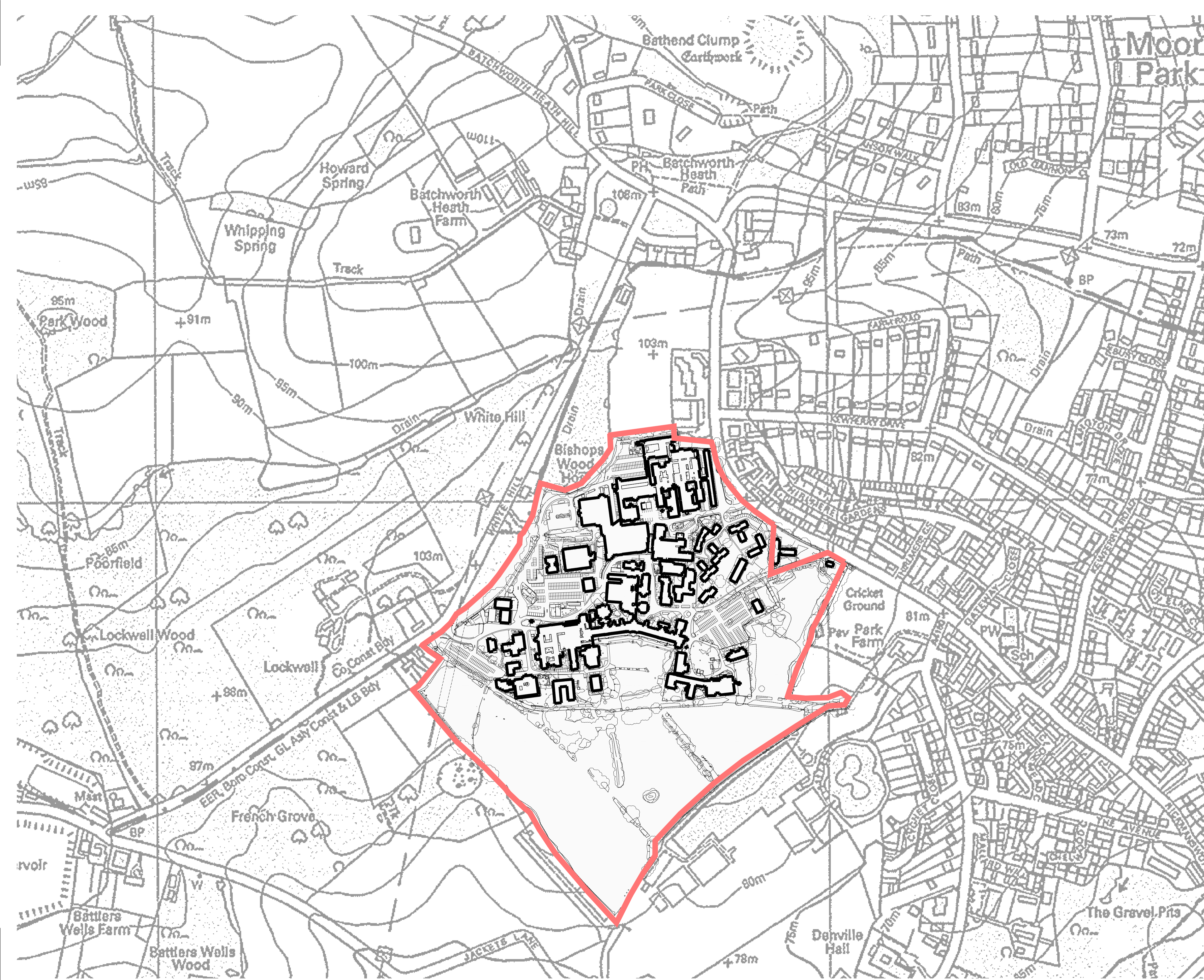
All forms must be received by the Council by 5pm 4th November 2014.

Appendix 1:
Site Location Plan

do not scale dimensions from this drawing



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 Land owned by The Hillingdon Hospital NHS FT

NOTE: boundaries shown are for general identification purposes only and must not be taken as defining legal title or ownership

BroadwayMalyan

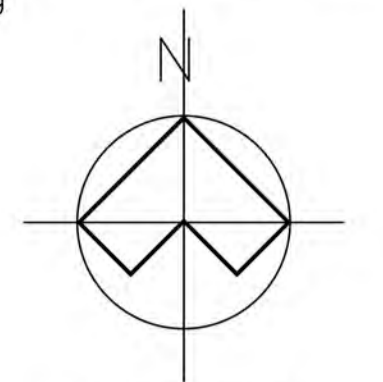
3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Location Plan

Status
FOR IDENTIFICATION ONLY
Scale 1:2500 @ A1 Drawn AH / OS Date 2014
1:5000 @ A3 Job number Drawing number Revision
23825 01 / 01 -
Original size 100mm Copyright Broadway Malyan Limited

Appendix 2:
Zoning Diagram

do not scale dimensions from this drawing



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- Site boundary
- Listed buildings
- The Hillingdon Hospital NHS FT retained area
- East and North Herts NHS Trust retained area
- Surplus area - residential, Phase 1 disposal
- Phase 2 disposal

NOTE: boundaries shown are for general identification purposes only and must not be taken as definitive legal title or ownership

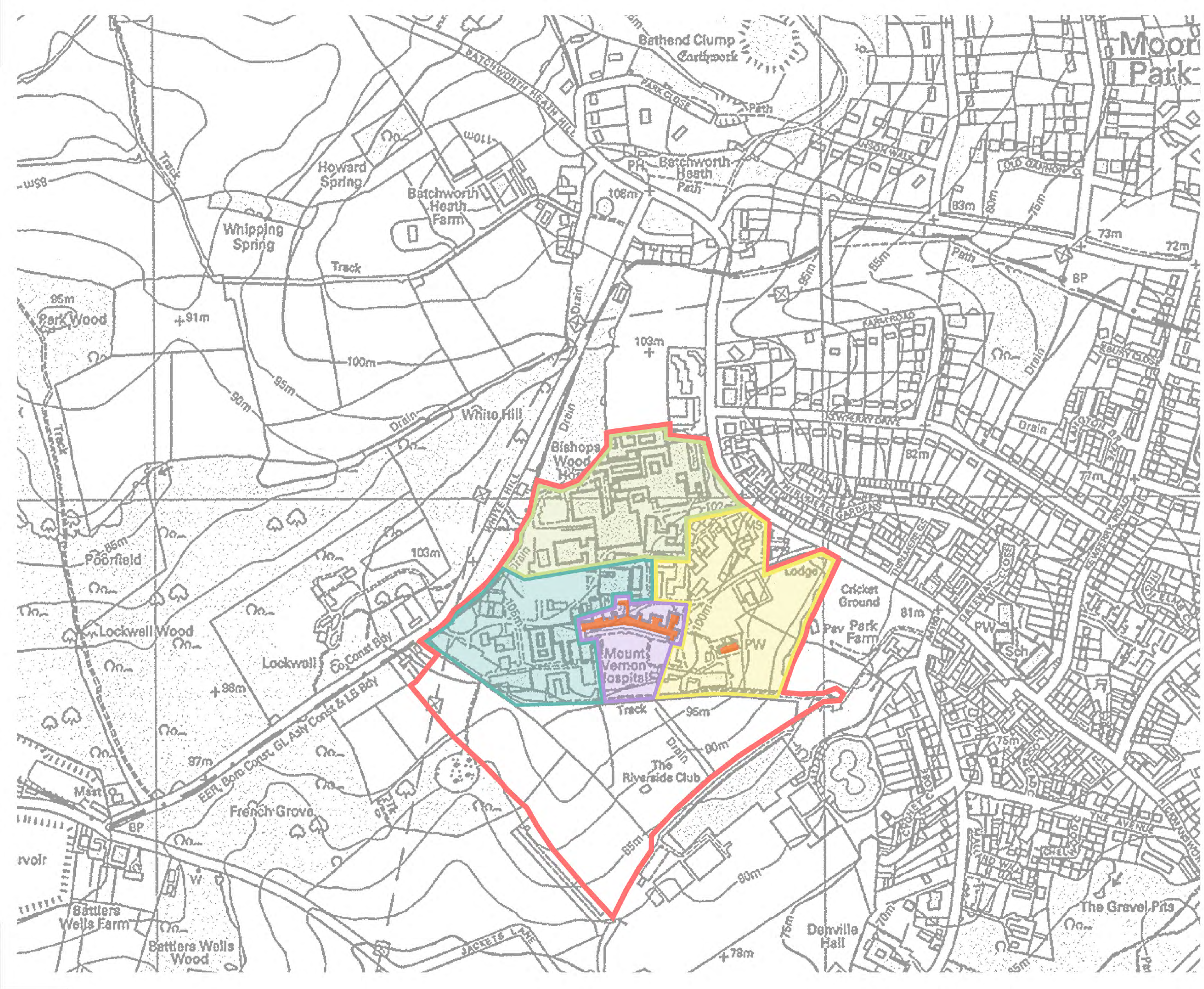
BroadwayMalyan
Planning

3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Preliminary Zoning Diagram

Status
FOR IDENTIFICATION ONLY

Scale	Drawn	Date
1:2500 @ A1	AH / OS	2014
1:5000 @ A3	Job number	Revision
23825	01 / 03	





HILLINGDON

LONDON

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	<input type="text"/>
House name	<input type="text"/>		
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraph 5.1- 5.10
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

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A plan identifying the Mount Vernon Hospital Site and adjoining land owned by the Trust is attached in Appendix 1 of these representations.

To ensure that the Trusts aspirations of future development at the Mount Vernon Hospital site can be delivered the Trust is seeking to secure a number of changes to the Hillingdon Local Plan part 2 in relation to the Mount Vernon Hospital site, to include:

- i. the removal of land from the Green Belt
- ii. the allocation of (part of the) land for housing
- iii. exclusion of land from the proposed extension of the Site of Grade 1 Nature Conservation Importance

In accordance with the NPPF, (i) above can only be achieved through the preparation or review of the local plan. The NPPF requires a demonstration of exceptional circumstances to justify such removal.

The Trust considers that exceptional circumstances exist in relation to the Mount Vernon Hospital site. Its case consists of a number of interrelated factors which in combination provide the necessary justification for removal of land from the Green Belt. Its exceptional circumstances case requires representations to be made in relation to different parts of the Hillingdon Local Plan part 2 (proposed submission version) and the representations set out below should be considered accordingly.

Please continue on a separate sheet if necessary

The extent of the land proposed to be removed from the Green Belt is identified on the plan at Appendix 2 to these representations.

Fundamentally, the drawing up or review of Green Belt boundaries should take account of the need to promote sustainable patterns of development (Paragraph 84 of NPPF). In particular, Paragraph 85 of the NPPF confirms that the following considerations shall apply:

- i. Green Belts should not include land it is unnecessary to keep permanently open. Therefore, the removal of land from the Green Belt will be justified if it can be demonstrated / established that its removal will not result in a loss of openness which would cause material harm to the purposes of including the land within the Green Belt. Important parts of this overall consideration are whether, as a result of changes to the land since it was originally included in the Green Belt, it can still be considered open in character and the extent to which it can still be said to perform a Green Belt purpose as a result.
- ii. How and to what extent will the removal of land from the Green Belt contribute towards the achievement of sustainable development and will it be consistent with the Local Plan Strategy for meeting identified requirements for sustainable development? In particular, will it deliver net economic, social and environmental gains, which include, but are not confined to, meeting strategic and local needs for improved healthcare provision, new homes and jobs.
- iii. Local Planning Authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period and should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The Trust considers that all of these considerations are met or satisfied by the proposed release of land at the Mount Vernon Hospital site and that this amounts to the exceptional circumstances necessary to justify the release. A more detailed description of the exceptional circumstances justifying release is set out below.

1. In accordance with paragraph 83 of the NPPF Policy EM2 of the Local Plan Part 1 makes specific provision for minor adjustment to the Green Belt to be made by the Local Plan Part 2- Site Specific Allocations LLD. Paragraph 8.24 of the Local Plan Part 1 also confirms that Policy EM2 provides for the Local Plan Part 2 to release land which no longer serves Green Belt purposes. Therefore in accordance with the NPPF an appropriate Local Plan policy context exists for land at the Mount Vernon Hospital Site to be released from the Green Belt, on the basis that it is not necessary to retain the land in the Green Belt. In this regard it should be noted that the Local Plan part 2 (submission version) proposes the deletion of the Former Perry Oaks Sludge Works Site, Heathrow from the Green Belt on this basis and so it is clear that Policy EM2 provides for adjustments to the Green Belt which are more than minor.
2. Paragraph 79 of the NPPF confirms that the essential characteristics of Green Belts are their openness and permanence. The extent to which any piece or parcel of land can be considered permanently open will be a matter of fact and degree in each case, and will depend primarily on the physical effect of built form upon the openness of the

land (ie. the extent to which it has “displaced” openness) and any changes in the relationship between built form and openness which have taken place over time. Any physical or actual loss of openness resulting from built form (buildings, structures and fixed surface infrastructure) can be objectively measured by reference to its extent / spread, footprint, floorspace, height and bulk, and in turn, this will have a significant bearing on any visual loss and the perception of openness.

3. Against this background, the land at the Mount Vernon Hospital site which the Trust proposes to be removed from the Green Belt has undergone significant development and change since its original designation as Green Belt in the 1950's. The land is now substantially and intensely developed with buildings, structures and hard surface infrastructure covering the vast proportion of the area and in many instances extending up to the boundaries of the land proposed for removal. It now exhibits a materially different character to that which existed at the time of its Green Belt designation, when a much greater proportion of the land was open and undeveloped, the density of development was much lower, with more substantial open areas in between, and much of the development comprised single storey ward accommodation. Therefore, at the time of Green Belt designation, the land exhibited some of the physical and visual characteristics of an institution in an open countryside setting. By contrast, the land is now dominated by built form and exhibits more of the characteristics of the adjoining urban area than it does of the Green Belt, which in the Trust's view, materially diminishes its contribution to the openness of the wider Green Belt and its ability to serve the purposes of designation.
4. Paragraph 80 of the NPPF confirms that Green Belts serve 5 purposes and in the Trust's view, the land proposed for release from the Green Belt makes only a limited contribution to these purposes for the following reasons:
 - i) on the basis that most of the land which is proposed to be deleted comprises previously developed land and its immediate curtilage, and is contiguous with and shares the same characteristics as the existing urban area, it does not perform any role in checking the unrestricted sprawl of large built up areas.
 - ii) for the same reason the previously developed land and its immediate curtilage does not perform any purpose in preventing neighbouring towns merging into one another, so restricting development upon it will not serve the purpose preventing neighbouring towns from merging.
 - iii) for the same reason, including the previously developed land and its immediate curtilage within the Green Belt does not assist in safe guarding the countryside from encroachment.
 - iv) the land to be deleted was not originally designated as Green Belt in order to preserve the setting and special character of historic towns and serves no purpose in this regard.
 - v) the retention of the land within the Green Belt will not assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Most of the land is previously developed and, in the Trust's view, forms part of the urban area.

Therefore its retention within the Green Belt will frustrate urban regeneration since it will prevent the Trust's plans to regenerate the land from being realised.

vi) in the Trust's opinion, the only part of the land which is proposed for removal from the Green Belt which currently serves a Green Belt purpose is a small area of open and undeveloped land lying west of and adjacent to Northwood Cricket Club.

However, the Trust considers that its contribution to Green Belt purposes is limited and that the harm caused to Green Belt purposes is outweighed by the benefits the sites regeneration resulting from its proposed removal from the Green Belt.

5. In addition to the scale and extent of built development currently on site, formal agreement was reached between the LPA and the Trust under Annex C of the former PPG3 in respect of recording the extent of previous development at the site in order that the buildings which had been removed may be re-provided in accordance with Annex C.
6. There is an acknowledged strategic and local need for improved and expanded healthcare provision to meet the future needs of the Communities served by the Trust and other occupiers of the site over the long term.
7. There is an acknowledged strategic and local need for improved and expanded residential accommodation for staff (Key workers), which cannot be met elsewhere.
8. There are significant operational health care and sustainability benefits of co-locating existing and new facilities at The Mount Vernon Hospital site as part of a mixed use scheme. Apart from the Hillingdon Hospital Site there are no suitable alternatives in the urban area and in the Trust's view, further development at both sites is necessary to achieve improved healthcare provision in the area.
9. The exceptions to inappropriate development set out at Paragraph 89 of the NPPF are not sufficient to meet the strategic long term needs for future healthcare and associated development at the Mount Vernon Hospital site outlined above.
10. Release of the land from the Green Belt will allow for some limited housing development to take place which is essential to the financial viability and delivery of improved healthcare provision in the area. In turn, the housing will make a contribution to meeting and exceeding the increased minimum housing targets for Hillingdon in accordance with revised Policy 3.3 of the Draft Further Alternations of the London Plan (January 2014).
11. Making the best and most effective use of land to be removed from the Green Belt will result in net gains across the economic, social and environmental dimensions of sustainable development, including recreational, ecological and landscape enhancements to land retained within the Green Belt owned by the Trust.
12. Whilst providing for the long term needs of the Trust for sustainable development, the reviewed boundaries will last beyond the plan period and are likely to be permanent. The revised Green Belt boundaries are clearly defined, using physical features that are readily recognisable, and they have been selected to ensure that no more land is removed from the Green Belt than is necessary. The revised Green Belt boundary shown on the plan at Appendix 2 follows NPPF guidance and in doing so will result in

the release of no more land from the Green Belt than is necessary to deliver the Trust's plans for necessary and sustainable development.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

For the Local Plan Part 2 to be sound, the Trust considers it necessary to amend paragraph 5.5 to 5.7, the list of proposals on Page 103 and the subsequent details of Green Belt Allocations set out on page 104 to 107 of the Site Allocations and Designations document to confirm the removal of the land at the Mount Vernon Hospital Site, identified on the plan at Appendix 2 to these representations, from the Green Belt.

It will also be necessary to amend the Policies Map (Atlas of Changes) to reflect these changes.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The proposed removal of Land at the Mount Vernon Hospital Site is fundamental to the delivery of the Trust's plans for future development at the site and improved healthcare provision to serve Hillingdon and the wider area.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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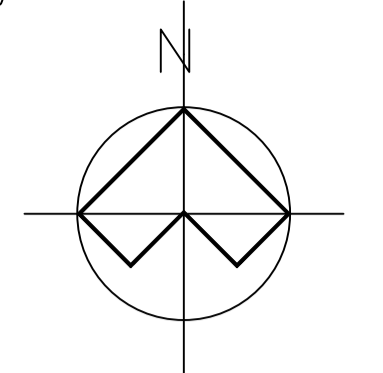
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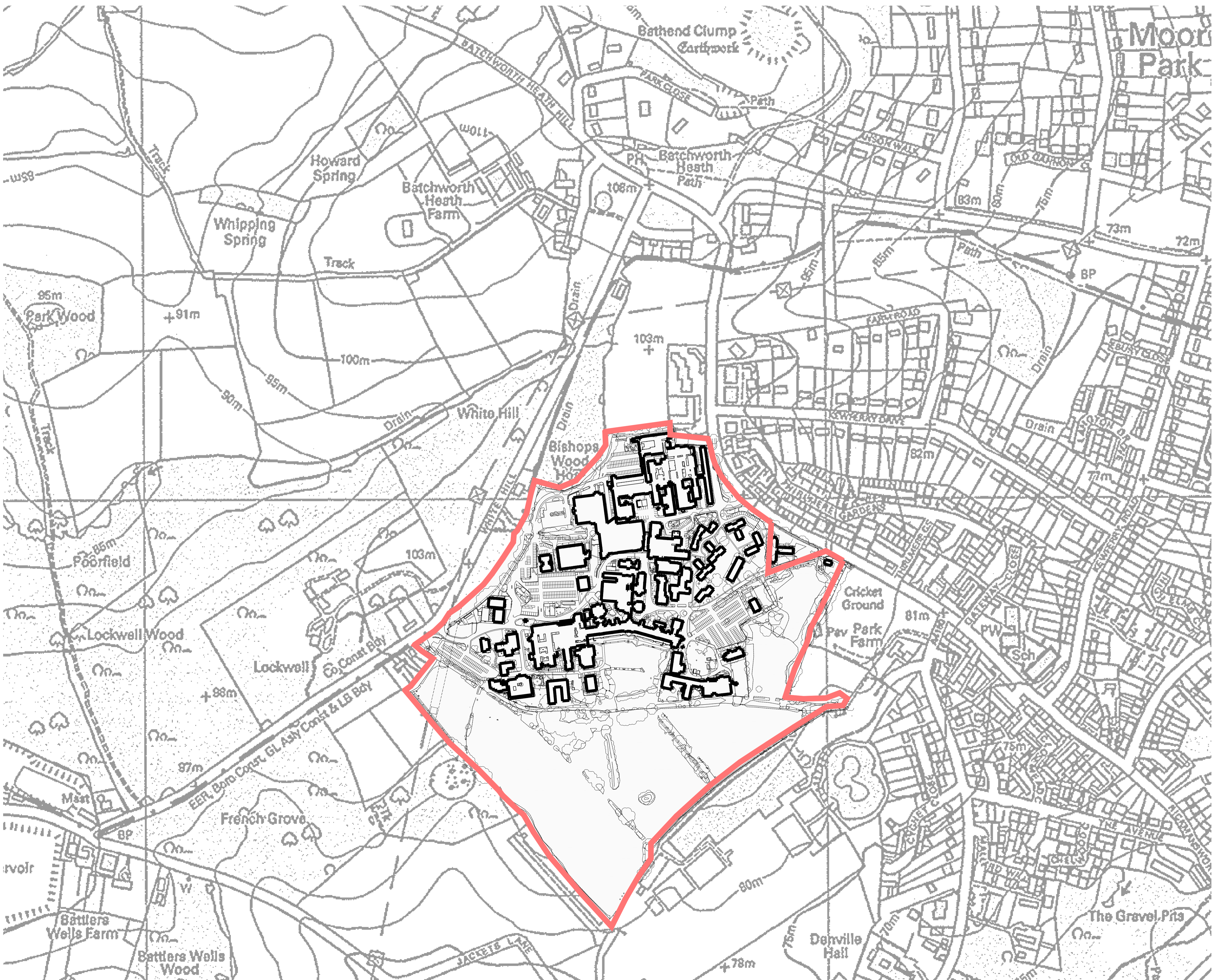
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Appendix 1:
Site Location Plan

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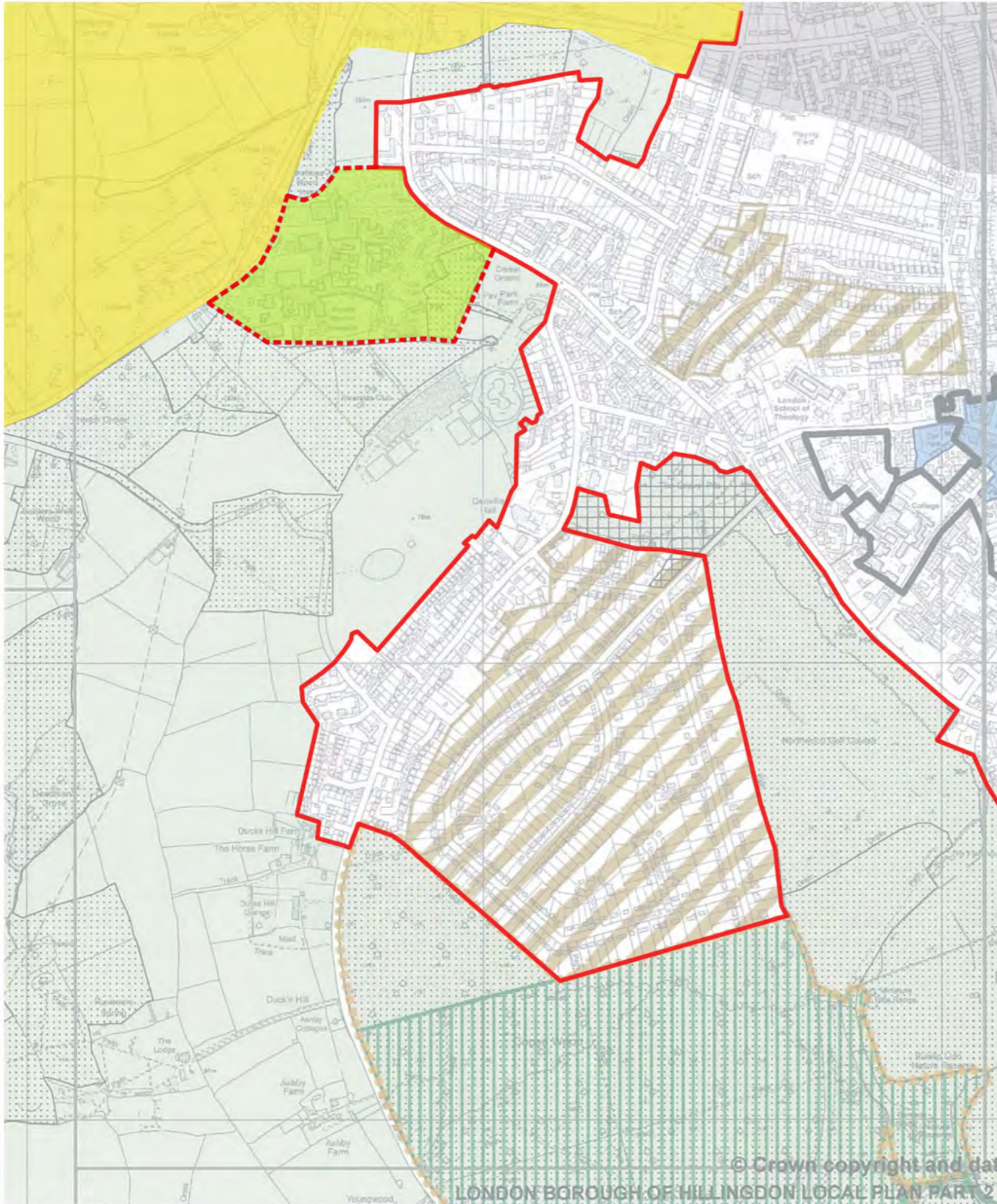
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Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Location Plan

Status
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Scale 1:2500 @ A1 Drawn AH / OS Date 2014
1:5000 @ A3 Job number Drawing number Revision
23825 01 / 01 -

Appendix 2:
Green Belt Plan

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- Existing Green Belt boundary
- - - Proposed Green Belt boundary
- Land to be excluded from the Green Belt
- Existing Green Belt Three Rivers Local Plan

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LONDON BOROUGH OF HILLINGDON LOCAL PLAN PART 2



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1	Estates Department		
Address 2	Pield Heath Road		
Town	Hillingdon		
County	Middlesex		
Postcode	UB8 3NN		
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	3
House name	Suite A		
Address 1	Weybridge Business Park		
Address 2	Addlestone Road		
Town	Weybridge		
County	Surrey		
Postcode	KT15 2BW		
Telephone	01932 837850		
Email	l.flannigan@nexusplanning.co.uk		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 6.1
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited on behalf of The Hillingdon Hospital NHS Foundation Trust (" The Trust "). The Trust is responsible for delivering healthcare services across a wide geographical area. A plan identifying the Mount Vernon Hospital site and adjoining land owned by the Trust is attached at Appendix 1 to these representations.

The Trust objects to the proposed extension of the existing Site of Nature Conservation Importance (Ref: SINC Extension 13) to include Land at the Mount Vernon hospital site, as identified in table 6.1 and detailed on page 147 of the Local Plan Part 2: Site Allocations and Designations Document. The area/ extent of the proposed extension to which the Trust raises objection is shown coloured yellow on the plan attached in Appendix 1 of these representations.

In summary, the Trust considers that the proposed SINC extension/ designation is not justified by the evidence, which clearly demonstrates that the land is not of sufficient nature conservation importance, either alone or in combination with the existing SINC designation, and does not meet the requirements for designation of a SINC.

Details of the Trust's objections set out below:

1. The basis for the proposed extension to the existing SINC designation to include land at Mount Vernon hospital is set out at paragraph 5.11-5.19 of the Site Allocations and Designations document. This text explains the process by which SINC's are identified, assessed and formally designated. In particular paragraph 5.16 and 5.17 explain that the basis of the proposed SINC extension to include land at Mount Vernon Hospital is the land's identification in the London Ecology Units Ecology Handbook 8, which in turn appears to be based upon fieldwork and assessment undertaken by the Unit in 2005.
2. It strikes the Trust that this represents an inadequate basis on which to designate land at the Mount Vernon Hospital site as a SINC, since the evidence is not sufficiently up to date and robust to justify the proposed designation. In particular, it takes no account of any changes which have taken place since 2007 and which may affect the nature conservation value/ importance of the land.
3. The Trust has commissioned Ecosa, an ecology specialist, to survey the site and further evaluate the SINC designation to establish whether it is justified. The full report is attached as Appendix 2 and concludes that the proposed designation of land shown on the plan at Appendix 1 is not justified.

Please continue on a separate sheet if necessary

4. Finally the Trust point out that there is an inconsistency between table 6.1 and the details of the proposed designation set out in on page 147 of the Site Allocations and Designation document. The former refers to the land's proposed designation as a Grade 2 SINC, whereas the latter refers to a Grade 1 designation.

However on the basis of the representations set out alone, it is clear that the land does not contribute to any part of the SINC designation, so this notion is pointed out directly for information.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The area of land to the south of the Mount Vernon Hospital is identified as a proposed extension to the SINC. However as identified within the ecology report that has been produced by Ecosa the northern area is partially tarmacked and separated into two fields with the southern area being tarmacked and used as the overspill car park.

Given the above, and the evidence provided by Ecosa it is clear that the site should not be designated as SINC. For this reason, we propose the site should not be included in the SINC extension.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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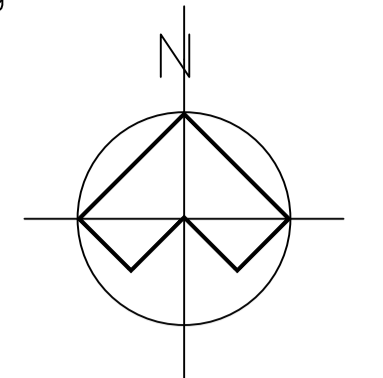
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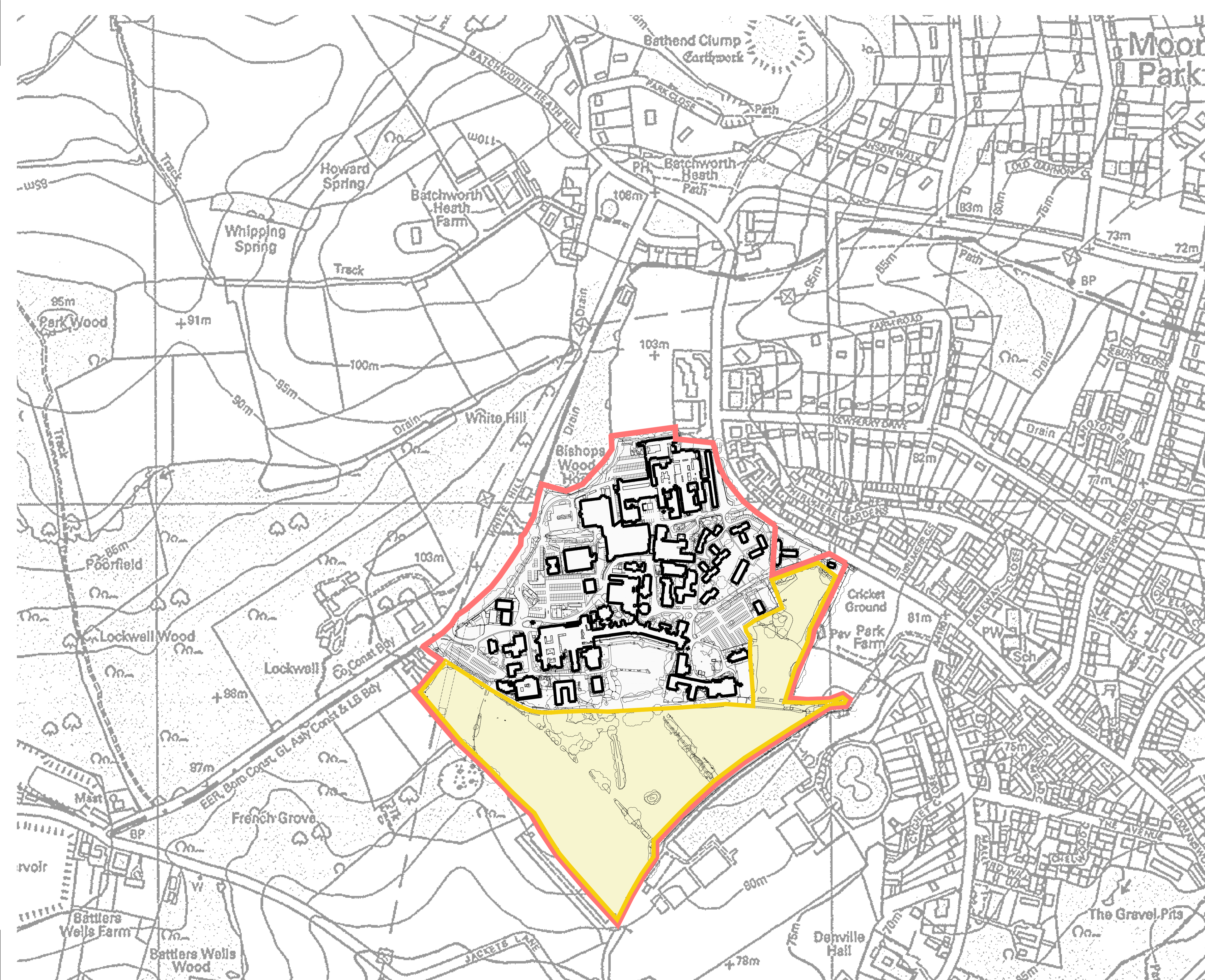
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Appendix 1:
Site Location Plan

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- Land owned by The Hillingdon Hospital NHS FT
- Land to be excluded from proposed SINC

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Appendix 2:

ECOSA Ecology Report

**LAND AT MOUNT VERNON HOSPITAL, RICKMANSWORTH ROAD,
NORTHWOOD, GREATER LONDON**

PHASE 1 HABITAT ASSESSMENT

Final Document

October 2014

Phase 1 and 2 Ecological Assessments • NVC • EclA • Management Plans • Protected Species Licensing
Habitats • Badger • Bats • Dormouse • Birds • Reptiles • Amphibians • Invertebrates • Riparian and Aquatic Species

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**LAND AT MOUNT VERNON HOSPITAL, RICKMANSWORTH ROAD,
NORTHWOOD, GREATER LONDON**

PHASE 1 HABITAT ASSESSMENT

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MAPS

Map 1 Phase 1 Habitats

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EXECUTIVE SUMMARY

- A Phase 1 habitat assessment was undertaken on 1st October 2014 at Land at Mount Vernon Hospital, Rickmansworth Road, Northwood, Greater London HA6 2RN. The site is listed within the Hillingdon Borough Local Plan (Part 2) as a proposed Site of Importance for Nature Conservation.
- The ecological assessment, comprising a Phase 1 habitat survey, was undertaken to ascertain the suitability of the site for designation as a Site of Importance for Nature Conservation.
- Land at Mount Vernon Hospital is situated on the south-western edge of the settlement of Northwood in the Borough of Hillingdon in north-west London. The centre of Northwood is located just over one kilometre to the east.
- The vegetation on site is roughly split between two sections. The area east of the hospital is largely composed of common and widespread habitats types with limited species diversity. A significant proportion of this area consists of a tarmac car park with no ecological value. The southern section of the site is composed of poor quality semi-improved neutral grassland fields with associated boundary tree lines, hedgerow and scrub.
- The data underlying the proposed SINC extension was collected during 2005, almost a decade prior to the proposed formal adoption of the land. During the interim, there have been changes to the land to the east of the hospital that reduce the ecological importance of this land at a Borough Level.
- It is recommended that the area to the east of the hospital is removed from the proposed SINC. Designating an area that is hardstanding is difficult to justify and the northern field no longer forms part of the larger management unit. Furthermore, the grassland in this area is mostly rank and has lost the neutral grassland characteristics that the proposed designation covers.
- The southern fields consist of poor examples of semi-improved neutral grassland with limited species diversity. This area was not considered to be of SINC quality because of the dominance of coarse grasses and scarcity of herbaceous species. There are other SINC designated for their neutral grassland in the local area and not designating the Mount Vernon site would not have a significant negative impact on the Borough of Hillingdon.
- It is recommended that the whole site is removed from the local plan.

1.0 INTRODUCTION

1.1 Background

Ecological Survey & Assessment Limited (ECOSA) have been contracted by Nexus Planning Limited to undertake a Phase 1 habitat assessment at Land at Mount Vernon Hospital, Rickmansworth Road, Northwood, Greater London HA6 2RN. The site is centred on National Grid Reference (NGR) TQ 077 916.

This report presents the findings of the Phase 1 habitat assessment carried out by ECOSA on 1st October 2014.

1.2 Aims and Scope of Report

This report is based on a Phase 1 field survey and desktop study which is aimed at assessing the suitability of the site for designation as a Site of Importance for Nature Conservation (SINC).

1.3 Background

The Greater London Authority (GLA) updated the ecological survey of the site during 2005 and recommended that the site be formally adopted as a SINC by Hillingdon Borough. However, this process was delayed and the proposed 'Fields and Hedgerows South of Mount Vernon Hospital' SINC was not included in the Hillingdon Borough Local Development Framework in 2006/07. During 2012 Hillingdon are currently consulting on their Local Plan Part 2, which is attempting to review the SINC's originally identified during the GLA work in 2005 and formally adopt these sites. Hillingdon adopted its Core Strategy (or Local Plan Part 1) in 2012 but this did not deal with the allocated land for SINC's.

1.4 Site Setting and Description

Land at Mount Vernon Hospital is situated in the London Basin Natural Area, described by Natural England as follows¹:

"The London Basin is a large, trough-like basin which was formed around 50 million years ago, and is filled with mostly sands and clay sediments. About one-third of the area is covered by London and the wildlife of the Natural Area is characterised by islands of semi-natural habitats. These habitats include large areas of woodland, with extensive stands of mature beech woods, significant areas of lowland mixed deciduous woodland and numerous large wood pastures and parklands. There are also notable areas of heathland in the Natural Area.

¹ Natural Areas are defined by Her Majesty's Stationery Office as 'biogeographic zones which reflect the geological foundation, the natural systems and processes and the wildlife in different parts of England, and provide a framework for setting objectives for nature conservation' (Biodiversity: The UK Steering Group Report, HMSO, 1995).

The London Basin is drained by the River Thames and its extensive network of tributaries. It also has numerous canals, with some areas that are very rich in plants and invertebrates. Other freshwater habitats include a series of flooded gravel pits and reservoirs that support nationally important populations of waterfowl. Associated with many of these freshwater habitats are areas of grazing marsh, neutral grasslands and fens."

The site is situated on the south-western edge of the settlement of Northwood in the Borough of Hillingdon in north-west London. The centre of Northwood is located approximately 1.3 kilometres (km) to the east. Other built up areas associated with Greater London are located in the vicinity of the site include Ruislip (4km south), Pinner (4.5km south-east) and Rickmansworth (4.4km north-west).

The wider landscape is split between urbanised areas to the east and semi-natural landscapes associated with farmland and patches of woodland to the south and west. Larger woodlands are associated with Bishop's Wood Country Park 380m to the west and Ruislip Wood 1.6km to the south.

The site itself is made up of five fields to the south of the hospital plus an overflow car park and small field to the east. The fields are bounded and bisected by thick hedgerows and tree lines. The hospital grounds border much of the northern boundary of the site, beyond the site to the east there is a cricket pitch and health centre. To the south and west are more fields used as pasture and a small pocket of broadleaved woodland.

1.5 Site Proposals

The survey area is proposed as a Site of Importance for Nature Conservation within the Hillingdon Borough Local Plan Part 2. The site covers an area of approximately 12 hectares.

2.0 METHODS

2.1 Introduction

This section details the methods used during the Phase 1 habitat assessment undertaken at Land at Mount Vernon Hospital, Northwood, Greater London.

2.2 Desk-Based Assessment Methods

2.2.1 Biological Records Centre

Greenspace Information for Greater London (GiGL) was consulted for information on non-statutory and statutory designated sites within a 1km radius of the site.

2.3 Phase 1 Field Assessment

The Phase 1 ecological field survey was carried out on 1st October 2014. The survey involved a walkover of the site to identify the habitat types and assess their value at a Borough level. Details of the species-specific survey methods are given below.

2.3.1 Vegetation

An assessment was made of all areas of vegetation within the site using the standardised Phase 1 survey methodology². This involved a walkover survey to identify broad vegetation types, which were then classified against Phase 1 habitat types. A list of characteristic plant species for each vegetation type was also compiled.

2.4 Phase 1 Survey Timing and Weather Conditions

The Phase 1 habitat survey was carried out by Simon Boswell of ECOSA on 1st October 2014. The weather conditions were occasional sun with approximately 20% cloud cover, an ambient temperature of 20°C and light south-westerly wind.

2.5 Phase 1 Survey Equipment

During the Phase 1 survey the surveyor was equipped with 10x40 binoculars, a 20x magnification hand lens and a digital camera.

2.6 Phase 1 Survey Limitations

The survey was undertaken at a time of year when some species of plant are either dormant or not in flower. Therefore, the survey of the vegetation in the proposed SINC was based on those species that were still flowering or that could be identified from their vegetative characteristics.

² Handbook for Phase 1 habitat survey: A technique for environmental audit – Field manual (2003), *Joint Nature Conservation Committee (JNCC)*

3.0 RESULTS

3.1 Introduction

This section details the results of the Phase 1 habitat assessment undertaken at Land at Mount Vernon Hospital, Northwood, Greater London during October 2014.

3.2 Desktop Study

3.2.1 Statutory and Non-statutory Designated Sites

The GiGL search revealed that there are no statutory and five non-statutory designated sites of nature conservation situated within a 1km radius of the site. Details of these designations are provided in **Table 2**.

Table 2: Designated sites located within a 1km radius of the Land at Mount Vernon Hospital site

Designation	Name	Relative Location	Reason for Designation
SINC (Borough Grade II)	Fields and Hedgerows South of Mount Vernon Hospital	On-site	A small number of fields with broad hedgerow and scrub borders. The fields are dominated by false oat grass <i>Arrhenatherum elatius</i> .
SINC (Borough Grade I)	Shepherd's Hill Wood and Fields	Adjacent, east	A large mosaic of fields and small woods with thick inner connecting hedges, creating a distinctly rural feel. A variety of habitats are present including ancient woodland and semi-improved neutral grassland.
SINC (Borough Grade I)	Kewferry Roughs	350m, north	Two formerly grazed meadows which have retained good habitat quality in spite of scrub encroachment. Habitats present include semi-improved neutral grassland, scrub and secondary woodland.
SINC (Borough Grade II)	Gravel Pit, Northwood	450m, south-east	An area of heavily wooded former gravel diggings. The woodland present is secondary and dominated by sycamore <i>Acer pseudoplatanus</i> .
SINC (Borough Grade II)	Bishops Wood	300m, north-west	Bishops wood is a small area of woodland dominated by pedunculate oak <i>Quercus robur</i> and hazel between White Hill and Mount Vernon Hospital. There is extensive standing and fallen deadwood within the woodland.

The survey site is entirely located within the 'Fields and Hedgerows South of Mount Vernon Hospital' SINC which is shown in the GiGL search as being of Borough Importance, Grade II. As explained within Paragraph 1.3 this 'SINC' in fact not yet designated and appears in the GiGL data search in error.

3.3 Vegetation Survey Results

The spatial distribution of habitats on site is shown in **Map 1**. The vegetation within the site is described here in general terms using Phase 1 habitat survey terminology

and referring to dominant, characteristic and other noteworthy species in each vegetation type within the survey area. The habitat types on site consist of:

- Semi-improved neutral grassland
- Poor semi-improved grassland
- Hardstanding
- Tree line
- Dense scrub
- Secondary woodland
- Fence
- Species-poor intact hedgerow

3.3.1 *Semi-improved Neutral Grassland*

The grasslands to the south of Mount Vernon Hospital were characterised by abundant tall fescue *Festuca arundinacea* and frequent meadow buttercup *Ranunculus repens*, cock's-foot *Dactylis glomerata* and perennial rye grass *Lolium perenne* (**Figure 1** and **Figure 2**). The fields appear to have been grazed fairly recently but no stock was present at the time of the survey. There were occasional herbaceous species within the sward including meadow vetchling *Lathyrus pratense*. The meadows were considered a poor example of the National Vegetation Classification³ (NVC) MG5 *Cynosaurus cristatus-Centaurea nigra* community.



Figure 1: Facing south-east across western field showing semi-improved neutral grassland



Figure 2: Facing south-east along south-western boundary showing semi-improved neutral grassland and intact hedgerow

3.3.2 *Poor Semi-improved Grassland*

The field to the east of the hospital had a short sward at the edges created by rabbit *Oryctolagus cuniculus* grazing (**Figure 3**). The northern section of this field was ranker with abundant smooth sow thistle *Sonchus oleraceus* associated with a drain

³ The National Vegetation Classification is a detailed method of classifying habitats based on the plant species composition present. It is specifically designed for use within the United Kingdom and is used extensively.

cover, the presence of this species, usually associated with disturbed ground, would indicate some recent soil disturbance (**Figure 4**). This northern section was considered more similar to poor-semi-improved grassland rather than semi-improved neutral grassland. The eastern field appears to have been mown in the recent past.



Figure 3: Rabbit grazed edges of eastern field with abundant broad-leaved dock



Figure 4: Northern end of eastern meadow showing abundance of smooth sow-thistle

The relative abundances of species is shown in **Table 3** relates to the southern fields and eastern field. The frequencies are based on the DAFOR scale where D = dominant, A = abundant, F = frequent, O = occasional, R = rare, L = locally, P = present (frequency not estimated).

Table 3: Species abundances within on-site grassland

English Name	Scientific Name	Eastern Field	Southern Fields
Agrimony	<i>Agrimonia eupatoria</i>	-	R
Ash saplings	<i>Fraxinus excelsior saplings</i>	R	-
Autumn hawkbit	<i>Scorzoneroides autumnalis</i>	R	R
Black knapweed	<i>Centaurea nigra</i>	O (LF)	R
Bird's foot trefoil	<i>Lotus corniculatus</i>	-	R
Bramble	<i>Rubus fruticosus</i> aggregate (agg.)	R	-
Broad-leaved dock	<i>Rumex obtusifolius</i>	F	R
Cock's-foot	<i>Dactylis glomerata</i>	O	F
Common fleabane	<i>Pulicaria dysenterica</i>	R (LO)	-
Common ragwort	<i>Senecio jacobaea</i>	R	R
Common sorrel	<i>Rumex acetosa</i>	O	R
Cranesbill sp.	<i>Geranium sp.</i>	R	-
Creeping bent	<i>Agrostis stolonifera</i>	O	O
Creeping buttercup	<i>Ranunculus repens</i>	F	F
Creeping cinquefoil	<i>Potentilla reptans</i>	O	R
Creeping thistle	<i>Cirsium arvense</i>	O	O (LA)
Dandelion	<i>Taraxacum</i> agg.	R	-
False oat grass	<i>Arrhenatherum elatius</i>	O	O
Fescue sp.	<i>Festuca sp.</i>	O	O
Field bindweed	<i>Convolvulus arvensis</i>	R	R
Germander speedwell	<i>Veronica chamaedrys</i>	O	-
Hard rush	<i>Juncus inflexus</i>	R	-
Hogweed	<i>Heracleum sphondylium</i>	R	R
Lesser burdock	<i>Arctium minus</i>	O	-
Lesser trefoil	<i>Trifolium dubium</i>	-	R

Table 3: Species abundances within on-site grassland

English Name	Scientific Name	Eastern Field	Southern Fields
Meadow barley	<i>Hordeum brachyantherum</i>	-	R
Meadow vetchling	<i>Lathyrus pratense</i>	-	O
Michaelmas daisy	<i>Aster</i> Species (sp.)	O	-
Nettle	<i>Urtica dioica</i>	R	-
Ox-eye daisy	<i>Leucanthemum vulgare</i>	R	R
Pendulous sedge	<i>Carex pendula</i>	O	-
Perennial rye grass	<i>Lolium perenne</i>	O	F
Red clover	<i>Trifolium pratense</i>	O	F
Ribwort plantain	<i>Plantago lanceolata</i>	O	R
Selfheal	<i>Prunella vulgaris</i>	-	R
Soft rush	<i>Juncus effusus</i>	R	-
Small timothy	<i>Phleum bertolonii</i>	-	R
Smooth sow-thistle	<i>Sonchus oleraceus</i>	R (LA)	-
Stone parsley	<i>Sison amomum</i>	R	-
Tall fescue	<i>Festuca arundinacea</i>	F	A
Willow saplings	<i>Salix saplings</i>	R	-
Yarrow	<i>Achillea millefolium</i>	O (LF)	-
Yorkshire fog	<i>Holcus lanatus</i>	F	O

3.3.3 Hardstanding

The area between the eastern field and more extensive field complex to the south is used as an overflow car park for the hospital (**Figure 5** and **Figure 6**). The tarmacadam appears to have been lain for some time and contains ephemeral vegetation including patches of annual meadow grass *Poa annua*, redshank *Polygonum Persicaria* and lesser burdock *Arctium minus*.



Figure 5: Facing west across overflow car park to the east of the hospital



Figure 6: Northern edge of car park showing access from hospital

3.3.4 Tree Line

Line of trees are scattered along the boundaries of the site. Most are composed of native species including horse chestnut *Aesculus hippocastanum*, pedunculate oak *Quercus robur*, ash *Fraxinus excelsior* and Sycamore *Acer pseudoplatanus*. Within the boundary features in the south there are a number of mature oak specimens. The south-eastern boundary of the southern section of the site is lined with a row of Leyland cypress x *Cupressocyparis leylandii* (**Figure 7**).

3.3.5 *Dense Scrub*

There are areas of dense bramble scrub scattered across the site including on the edges of hedgerows in the south. The most extensive areas of this habitat are associated with area to the south of the overflow car park. This area contains a large amount of dumped rubbish and litter including large items such as sofas and toys.

3.3.6 *Dry Pond*

The far eastern corner of the southern section of the site is shown as a pond on OS 1:25,000 mapping. At the time of the survey this area was heavily overgrown with bramble scrub and it was not possible view this water feature adequately, however the dense bramble cover would indicate that this feature is now dry.

3.3.7 *Secondary Woodland*

Small strips of secondary woodland were recorded in the eastern section of the site, these areas were characterised by a dense understorey and widely scattered semi-mature trees. There was no particularly dominant species within the canopy but oak, ash and sycamore were most frequently recorded.

3.3.8 *Fence*

A fence is present between the eastern boundary of the northernmost field and the adjacent cricket ground (**Figure 8**).



Figure 7: Leyland cypress tree line along south-eastern site boundary



Figure 8: Eastern field showing wooden fencing

3.3.9 *Species-poor Intact Hedgerow*

A section of blackthorn *Prunus spinosa* dominated species-poor intact hedgerow is located along the south-western boundary of the site (**Figure 2**). A second section of species-poor intact hedgerow is located to the east of the car park, this hedgerow contains field maple and hawthorn. Tree guards were still present on the shrubs and the maturity of the hedgerow would indicate that it was planted between 10-15 years ago.

3.3.10 Vegetation Summary

The vegetation on site is roughly split between two sections. The area east of the hospital is largely composed of common and widespread habitats types such as hardstanding and poor semi-improved grassland with limited species diversity. A significant proportion of this area consists of a tarmacadem car park with no ecological value. The eastern section was considered to be of **low ecological value**. The southern section of the site is composed of semi-improved neutral grassland fields with associated boundary tree lines, hedgerow and scrub. This area was considered to be of **medium ecological value**.

4.0 EVALUATION, IMPACTS AND RECOMMENDATIONS

4.1 Introduction

This section presents the conclusions of the Phase 1 habitat assessment. It provides an initial assessment of the likely ecological constraints to the proposed development and detailed recommendations for any further survey work or mitigation measures considered necessary.

4.1.1 Summary

Habitat within the proposed SINC includes large semi-improved neutral grassland fields with boundary tree lines, hedgerow and scrub. The section to the east of the hospital consists of a tarmacked car park and a northern field mainly comprising poor-semi-improved grassland.

The data underlying the proposed SINC extension was collected during 2005, almost a decade prior to the proposed formal adoption of the land. During the interim, there have been changes to the land to the east of the hospital that reduce the ecological importance of this land at a Borough Level.

4.1.2 Suitability of Site for SINC designation

Semi-improved neutral grassland is not a Biodiversity Action Plan habitat within the London area, however good examples of this type of grassland are now relatively scarce nationally. Neutral grassland requires management to retain species diversity, usually in the form of low input grazing. The five connected fields in the south of the site form a management unit that can still be managed through grazing and this area could be retained as semi-improved neutral grassland. The tarmacking of the former field to the east of the site hospital has effectively severed the small field north of the car park from the management unit in the south. This has resulted in this area being mechanically mown with the arisings being left *in situ*. Mechanically mowing grassland and leaving the cuttings has the effect of increasing nutrients within the soil through decomposition of arisings allowing vigorous grasses to outcompete and smother herbaceous species. Furthermore, the northern area of this field has been disturbed in the recent past and ruderal vegetation is becoming dominant in the sward.

4.1.3 Recommendations

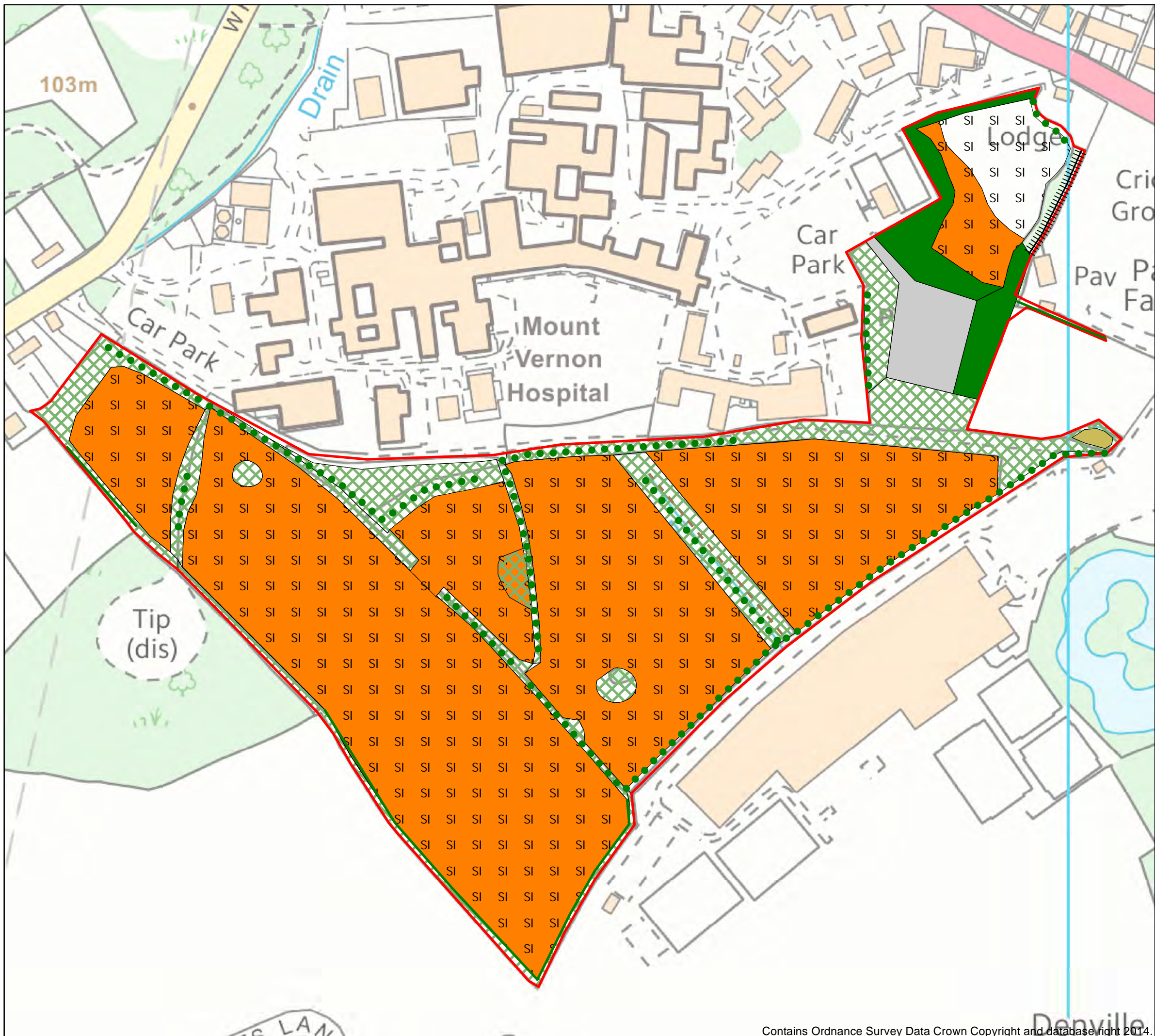
Designating an area of hardstanding for its nature conservation interest is difficult to justify and the northern field no longer forms part of the larger field system and management unit. Furthermore, the grassland in the eastern area is mostly rank and has lost the characteristics of neutral grassland. Taking these facts into consideration

it is recommended that the area to the east of the hospital is removed from the area proposed as a SINC.

The southern fields consist of poor examples of semi-improved neutral grassland with limited species diversity. This area was not considered to be of SINC quality because of the dominance of coarse grasses and scarcity of herbaceous species. There are other SINC's designated for their neutral grassland in the local area and not designating the Mount Vernon site would not have a significant negative impact on the Borough of Hillingdon.

It is recommended that the whole site is removed from the local plan.

Map 1 Phase 1 Habitats



LAND AT MOUNT VERNON HOSPITAL, NORTHWOOD

PHASE 1 HABITAT ASSESSMENT

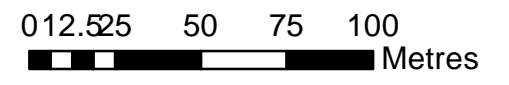
Map1 - Phase 1 Habitats

Client:	Nexus Planning
Date:	October 2014
Status:	Draft

KEY

- Proposed SINC Boundary
- Phase 1 Habitats**
- Secondary Woodland
- Dense Scrub
- Semi-improved Neutral Grassland
- Poor-semi-improved Grassland
- Dry Pond
- Hardstanding
- Intact Species-poor Hdgerow
- Tree line
- Fence
- Dry Ditch

Scale at A3: 1:2,200



ECOSA

Ecological Survey & Assessment Limited
 Ten Hogs House, Manor Farm Offices,
 Flexford Road, North Baddesley, SO52 9DF
 Tel: 02380 261065 Email: info@ecosa.co.uk
 www.ecosa.co.uk



HILLINGDON

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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Hillingdon Hospital NHS Foundation Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Lance
Last name	Flannigan
Company	Nexus Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Atlas of Changes Part 3

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of The Hillingdon Hospital NHS Foundation Trust ("The Trust"). The Trust is responsible for delivering acute healthcare services across a wide geographical area including the London Borough of Hillingdon.

The Trust has made separate representations to the Local Plan Part 2 in respect of land at the Mount Vernon Hospital Site. Amongst other things, these representations seek the following:

- i) The removal of land at the Mount Vernon Hospital Site from the Green Belt. The extent of land to be removed is shown on the plan at Appendix 1 to these representations.
- ii) Deletion of the proposed extension to the Grade I SINC to include land at the Mount Vernon Hospital Site (Ref. SINC Ext 13) as shown on the plan at Appendix 2 to these representations.
- iii) The allocation of land at the Mount Vernon Hospital Site, as shown on the plan at Appendix 3 to these representations, as a housing site.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

To make the Local Plan Part 2 sound, the Trust considers it is necessary to amend the Policies Map (Atlas of Changes) as described in these representations (refer to Q5) and shown on the plans at Appendices 1, 2 and 3.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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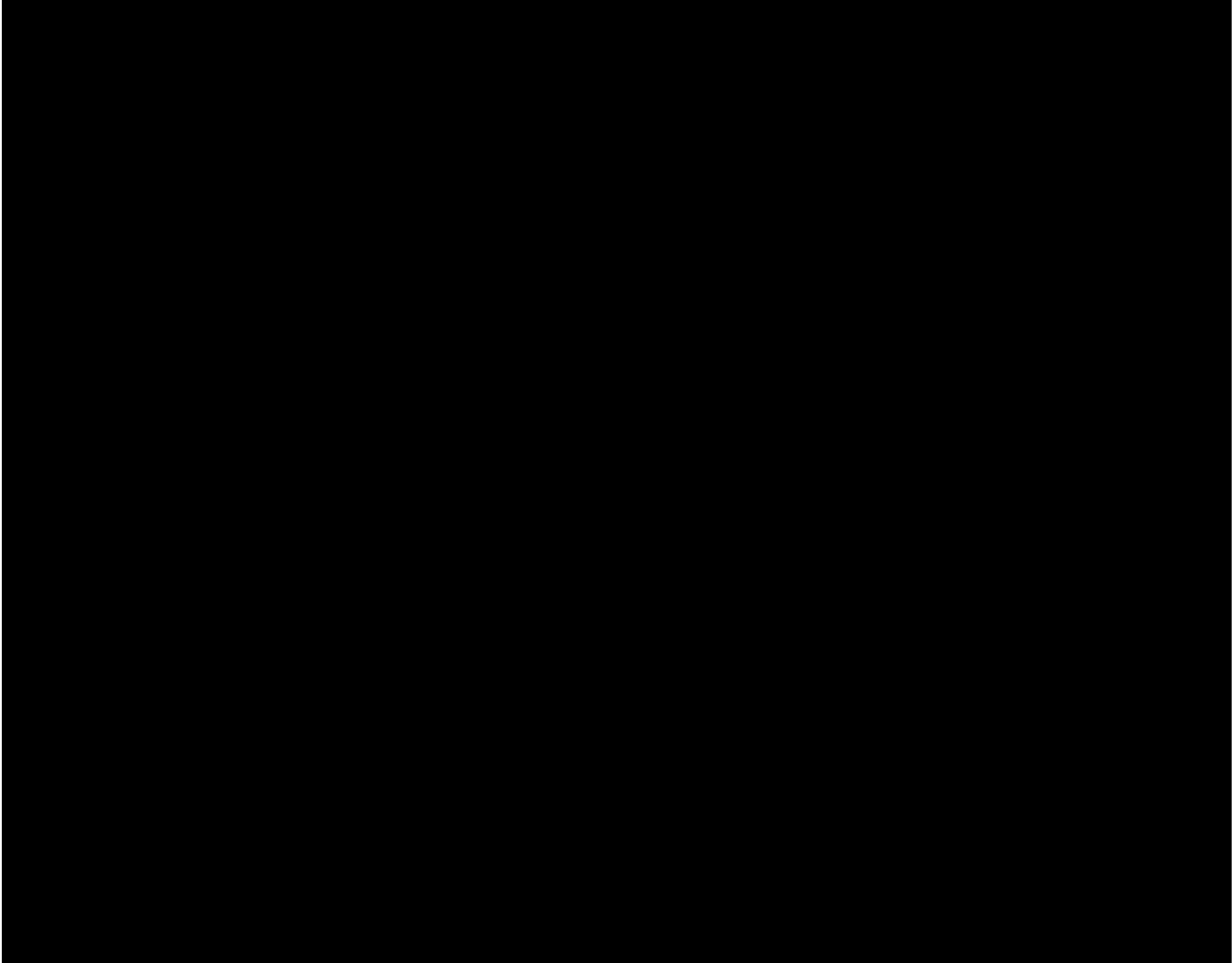
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

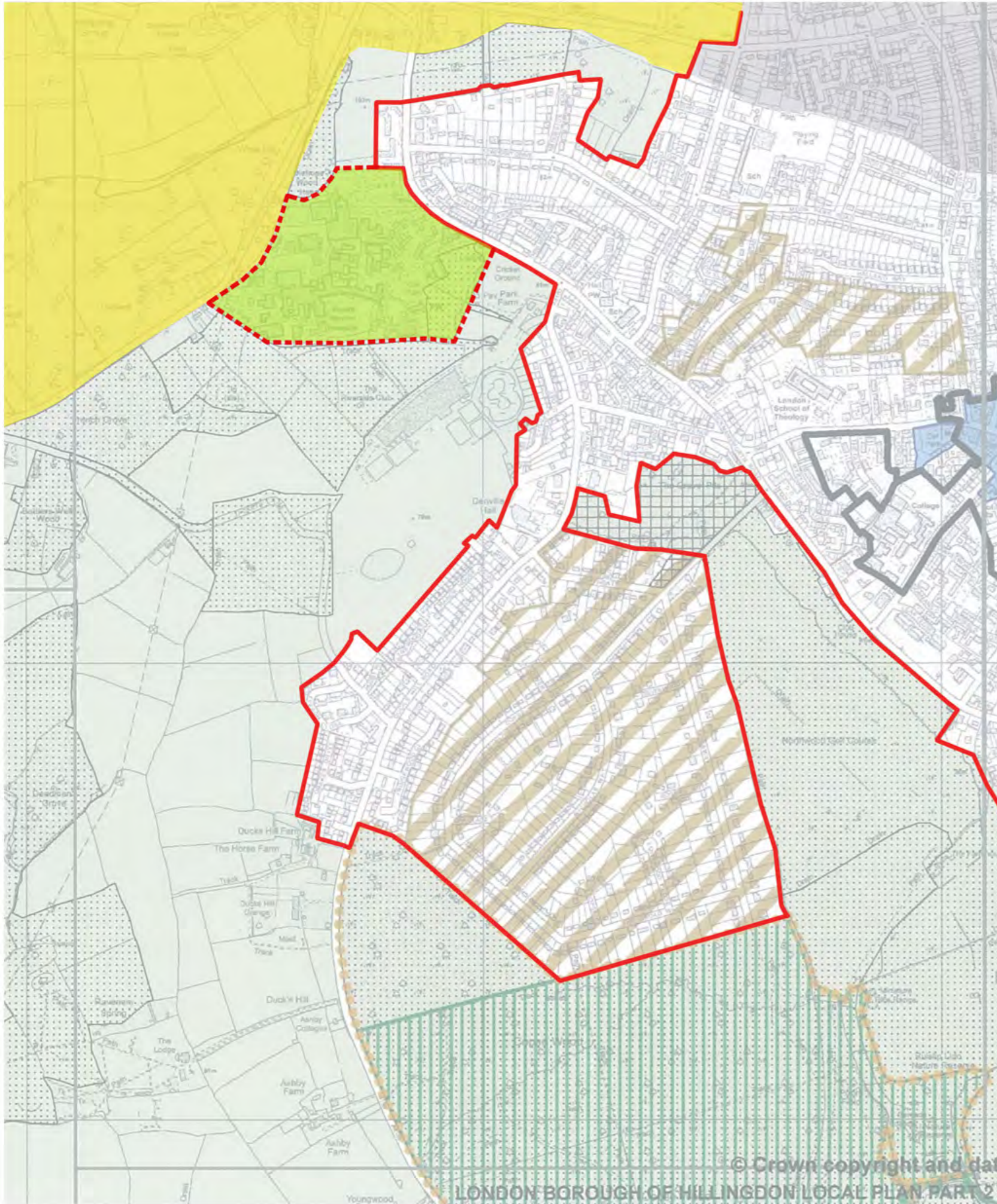
The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Appendix 1:

Proposed Green Belt Boundary

do not scale dimensions from this drawing



- Existing Green Belt boundary
- - - Proposed Green Belt boundary
- Land to be excluded from the Green Belt
- Existing Green Belt Three Rivers Local Plan

NOTE
boundaries shown are for general identification purposes only and must not be taken as defining legal title or ownership

BroadwayMalyan

3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Proposed Green Belt
Boundary

Status	FOR IDENTIFICATION ONLY		
Scale	Drawn	Date	
not to scale	AH	2014	
Job number	Drawing number	Revision	
23825	01/02		

Original size 100mm Copyright Broadway Malyan Limited

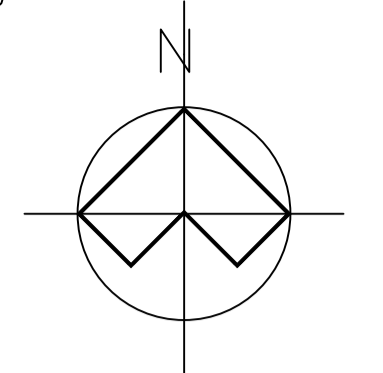
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LONDON BOROUGH OF HILLINGDON LOCAL PLAN PART 2

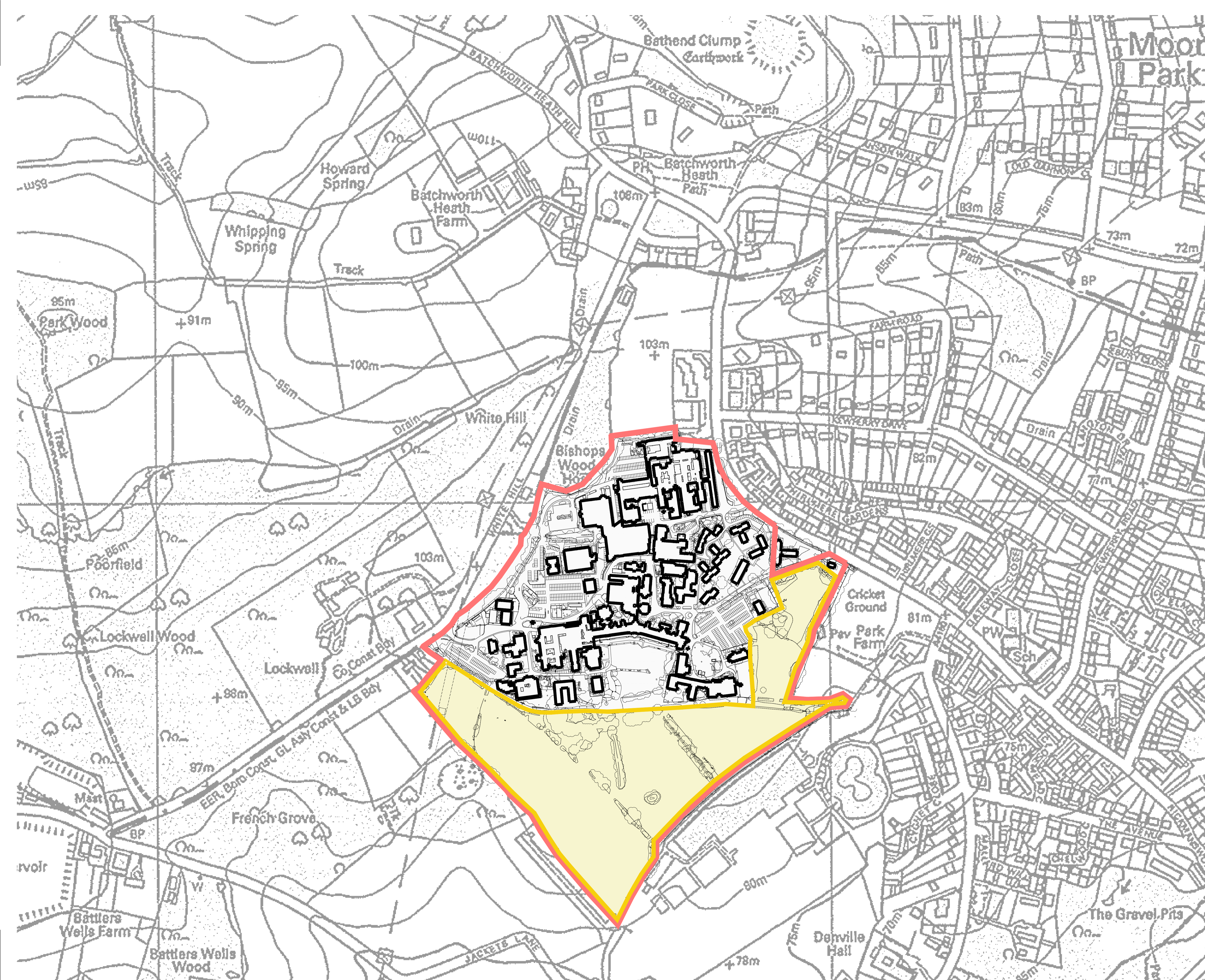
Appendix 2:

Deletion of the proposed extension to the
Grade I SINC

do not scale dimensions from this drawing



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- Land owned by The Hillingdon Hospital NHS FT
- Land to be excluded from proposed SINC

NOTE: boundaries shown are for general identification purposes only and must not be taken as definitive legal title or ownership

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3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

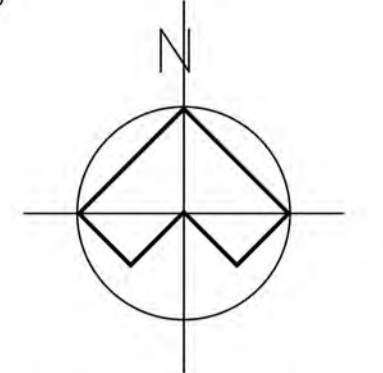
Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Location Plan

Status
FOR IDENTIFICATION ONLY

Scale	Drawn	Date
1:2500 @ A1	AH / OS	2014
1:5000 @ A3	Job number	Revision
23825	01 / 04	-

Appendix 3:
Preliminary Zoning Diagram

do not scale dimensions from this drawing



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Broadway Malyan Limited

- Site boundary
- Listed buildings
- The Hillingdon Hospital
NHS FT retained area
- East and North Herts NHS Trust
retained area
- Surplus area -
residential, Phase 1 disposal
- Phase 2 disposal

NOTE
boundaries shown are for general identification
purposes only and must not be taken as definit
legal title or ownership

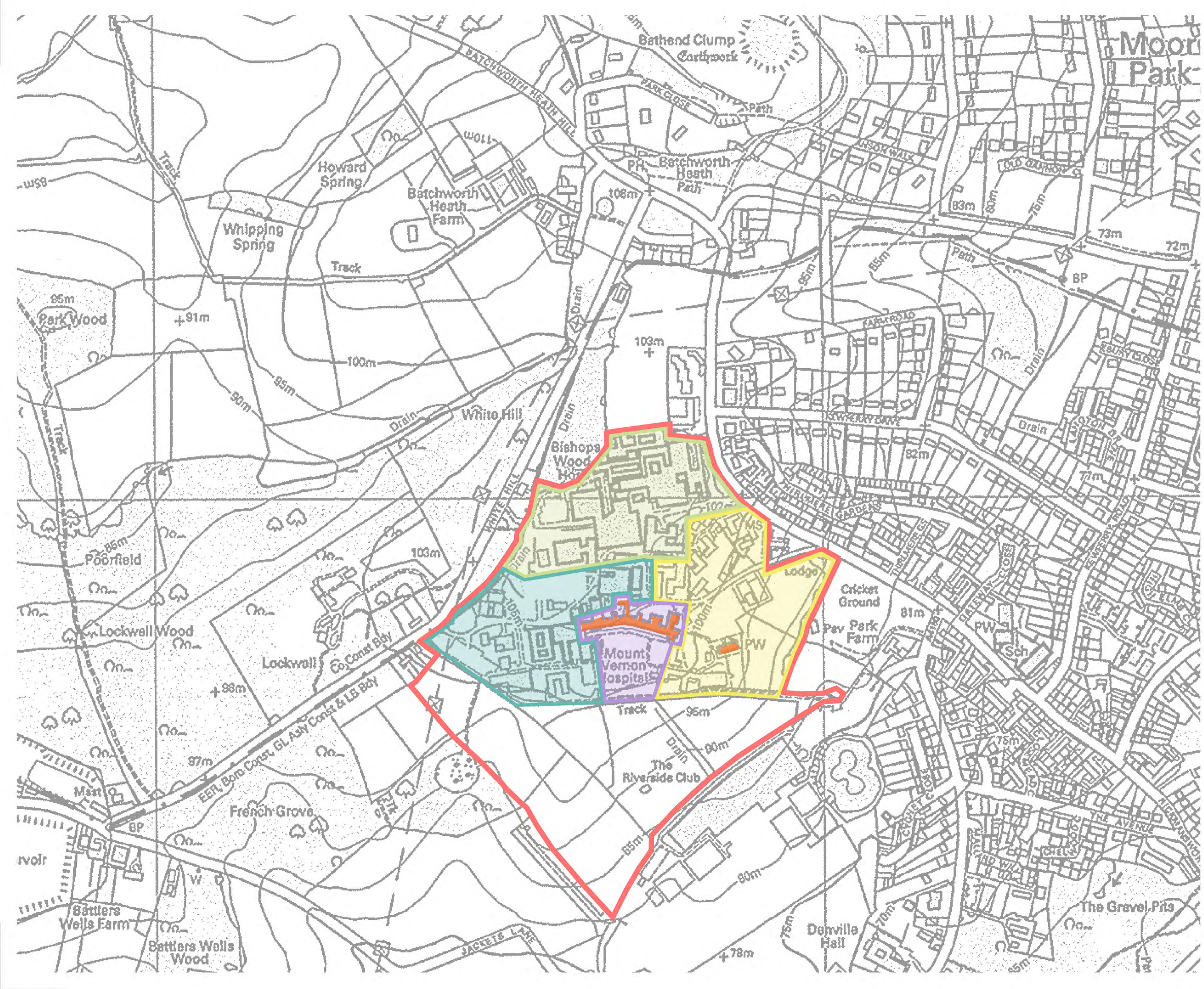
**BroadwayMalyan
Planning**

3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Preliminary Zoning Diagram

Status
FOR IDENTIFICATION ONLY
Scale 1:2500 @ A1 Drawn AH / OS Date 2014
1:5000 @ A3 Job number 23825 Drawing number 01 / 03
Revision

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1. Name and Address	
Title	Mr
First name	Jeffrey
Last Name	Bailey
Organisation (if relevant)	Northwood Residents' Association
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		

Email	jeffrey.bailey@virgin.net
-------	---------------------------

Email	
-------	--

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	The policy numbers are indicated in the comments below
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
--------------------------	-------------------------------------

<input checked="" type="checkbox"/>	It is not effective
-------------------------------------	---------------------

<input type="checkbox"/> It is not justified	<input type="checkbox"/> It is not consistent with National policy
--	--

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The proposed policies set out below are for varying reasons not effective:

Policy DMH6 (Garden and Backland Development): this should place greater emphasis on retaining all viable trees. Replacing (or “re-providing” in the language of the draft) is not usually an acceptable solution given the long lead time before any replacement tree can become mature.

Policy DMH7 (Provision of Affordable Housing): historically many developers have sought to reduce or remove altogether the “affordable” element of a scheme, which they presumably believe detracts from the attractiveness of the scheme, by paying a financial contribution in lieu. There should be few, if any, “exceptional circumstances” in which the proposed policy should allow this. Far better for the affordable housing to be integrated within the scheme itself.

Policy DMTC2 (Primary and Secondary Shopping Areas): given the ever-changing nature of retail shopping (internet etc) and its effect on “traditional” shopping areas, the 70% and 50% fixed retail unit tests might be or become over-restrictive and lead to empty units when other Class A uses may be acceptable.

DMTC3 (Maintaining the Viability of Local Centres and Local Parades): Paragraph A should require that any change of use from A1 in a Local Centre should be subject to the additional test of “range and choice” as is currently proposed for local shopping parades in paragraph B. In addition the proposed policy could benefit from being strengthened by including within it concepts, currently contained in the London Plan, encouraging competitiveness and developing within town centres a sense of place and identity for sustainable local communities.

DMTC5 (Shop fronts): on applications for permission to install security grills, the need for security should prevail over design where the two are incompatible.

DMHB22B (Side extensions): the 1 metre/1.5 metre rule should be reworded along the lines of paragraph 5.24 of the current Saved Policies to apply to the addition of a second storey to a pre-existing single storey extension – thereby blocking an obvious loophole which could otherwise be manipulated.

DMHB24 (Basement Development): The methodological demonstrations referred to in paragraph A should include the possible effect on structural stability of existing nearby properties and should entitle the Council to require the applicant to submit as part of the application a structural survey report and method statement from a suitably qualified engineer, compliance with good practice then being required by the imposition of a suitable

planning condition.

Trees generally: The proposed policies DME15 to DME18 are not strong enough to protect trees. In particular existing Saved Policies BE38 and BE39 are not replicated in the draft policies and there appears to be no planning recognition of the protection and enforcement mechanisms of Tree Preservation Orders. These omissions need to be positively addressed.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The changes are set out above.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

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<input type="checkbox"/>	Yes, I would like to participate in the oral examination

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Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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- Email to: localplan@hillingdon.gov.uk

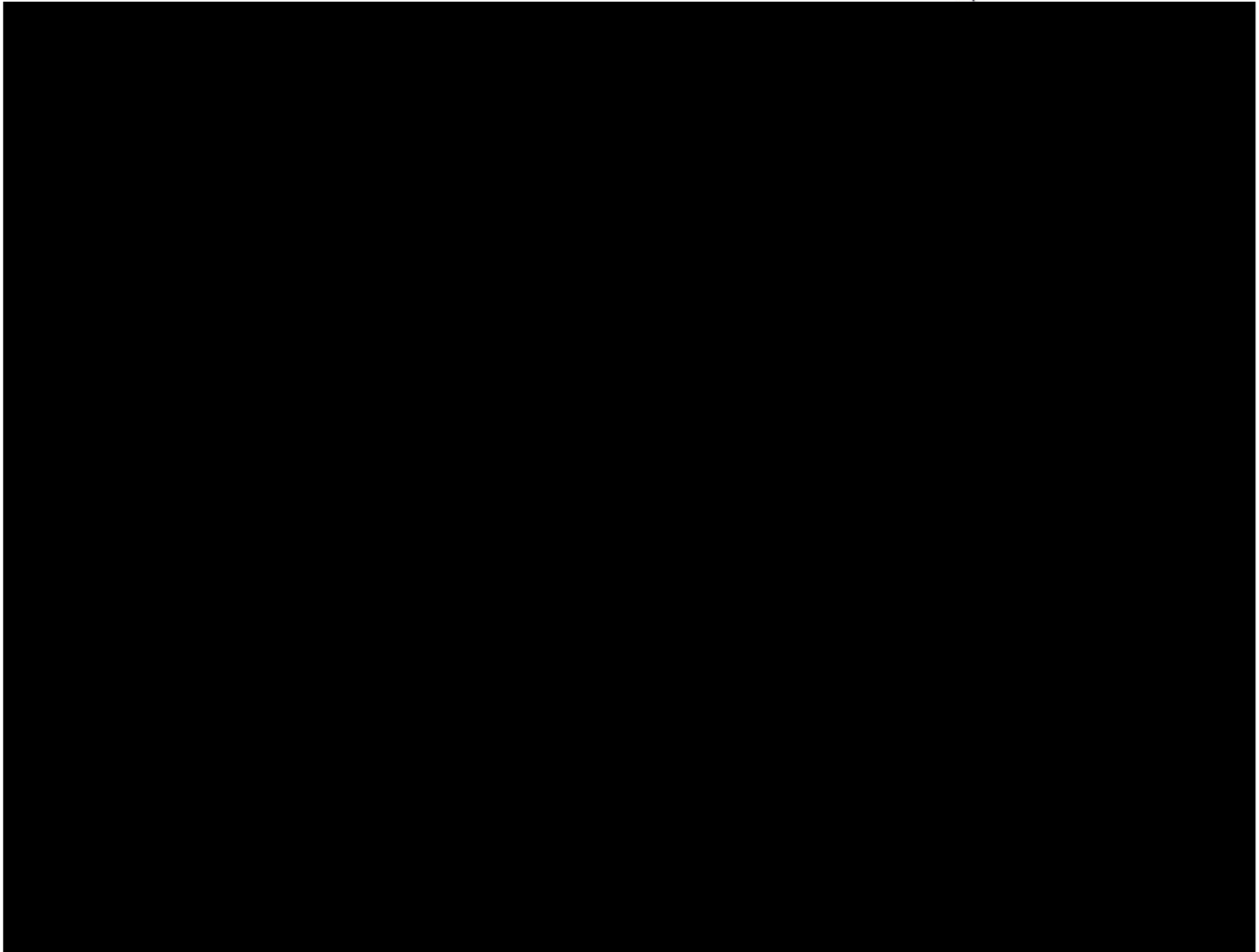
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillington.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





Creating a sporting habit for life

Policy Team
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

31 October 2014

Dear Sir/Madam

Local Plan Part 2 - Development Management Policies: September 2014

Thank you for inviting Sport England to comment on the above document.

Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Having viewed the document, Sport England has the following comments to make in the attached table.

We trust you will give the matters raised in the table your fullest consideration. If you require any further information or clarification, please do not hesitate to contact the undersigned on the details listed below.

Yours Sincerely

A solid black rectangular box used to redact the signature of Katy Walker.

Katy Walker
Principal Planning Manager

Page no.	Paragraph/ Table/Figure	Response object/ support	Comments	Soundness issue
104	Policy DMCI 1	Object/ Suggested amendment	<p>Policy DMCI 1 relates to the retention of existing community, sport and education facilities. The policy sets out a criteria against which proposals for the loss of existing community, sport or educational facility will be permitted. In doing so that policy places an onus upon the applicant to demonstrate that the loss of existing facilities would not lead to a shortfall in provision. However this is not the approach advocated by paragraph 73 of the NPPF and put an undue onus on the applicant, who would need to carry out a Borough wide study to demonstrate such a case.</p> <p>Para 73 makes clear that:</p> <p><i>Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</i></p> <p>Sport England is not aware that LB Hillingdon has undertaken a Playing Pitch Strategy or Built Facility Strategy in place to underpin its Local Plan. Sport England would urge the Council to undertake these evidence base assessments/strategies.</p> <p>The Council resolve itself of this obligation and the onus of the above on development management process at front end decision making and on the applicant. This is not a sound approach.</p>	<p>Policy DMCI is not considered to meet the following tests of soundness:</p> <p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p> <p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence</p>

		<p>The Council must undertake a robust assessment which clearly assesses existing and future sporting needs and identifies and names specific sites which are found to be surplus and thus appropriate for development.</p> <p>Part C (ii) if read correctly (the wording is unclear and confusing) seeks to address matter which should rightly be dealt with by Environmental Health. If existing uses are deemed unacceptable by way of nuisance, then appropriate mechanisms exist via Environmental Health to deal with this. This part of the policy is therefore considered unnecessary and Sport England requests it be deleted.</p> <p>Part C (iii) suggests that the loss of sporting facilities would be deemed acceptable if the redevelopment of the site would secure an over-riding public benefit. However in the absence of a clear and robust evidence base, it will be difficult for the Council as decision maker on any planning application to assess the community benefit of the existing sporting use. The policy is therefore hugely subjective creates uncertainty. Sport England considers that the policy would have merit, if it was changed to read as follows:</p> <p>“...the redevelopment of the site would secure an over-riding public sporting benefit.”</p>	
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HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by 5pm Tuesday 4th November 2014.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	Mr		
First name	Fil		
Last Name	Gray		
Organisation (if relevant)	Trade Sale		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA 25: Cape Boards
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please refer to the attached letter.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please refer to the attached letter.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Owner of the site effected by the policy to which this objection relates.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

A large, empty rectangular box with a thin black border, intended for providing comments on the technical reports mentioned in the question above. The box is currently blank.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group

Trade Sale Limited



31st October 2014

Dear Sir/Madam

London Borough of Hillingdon
Proposed Submission Site Allocations and Designations Plan
Policy SA25 Cape Boards

I refer to the Site Allocations and Designations Plan which is being consulted upon until the 4th November 2014.

I am writing with specific regard to Policy SA25 which proposes the allocation of the Cape Board site at Iver Lane, Cowley. I am writing in my capacity as the owner of this site.

In summary, Trade Sale Limited objects to the allocation of the Cape Boards site for a residential led mixed use redevelopment comprising about 9 hectares of residential (circa 315 units) and about 2.5 hectares of mixed commercial uses (B1, B2 and B8) in the Local Plan Part 2 on the basis that the site is not available, viable or suitable for the proposed use.

Our objection is set out below by reference to the specific questions that you have asked as part of your consultation.

Question 5 – Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate?

1. Trade Sale Limited owns the land subject to the proposed allocation under Policy SA25. This site is occupied by a number of established commercial uses and is subject to a variety of leases and is not, therefore, currently available for redevelopment. As such, the Council can not rely on this site coming forward for development during the plan period. This site is unlikely, therefore, to contribute towards meeting the housing needs derived under the London Plan for Hillingdon.
2. The site is a contaminated site. Whilst it is possible that the site could be remediated, this would be a very costly process and this does raises issues of viability.

3. The draft policy refers to the redevelopment of the site not prejudicing the waste related use that has recently been permitted to the north east of the site (reference 60930/APP/2011/2307). Whilst it would be technically feasible to achieve a layout that did not prejudice this use, we are concerned about the quality of the resulting residential environment that could be achieved. This would be further eroded by the existing industrial uses to the north of the site.
4. There are high voltage overhead electricity pylons which run to the west of the site. Any residential development would need to be located at least 50 metres from the pylons. This would reduce the potential developable footprint by about 3.2 acres. Whilst it would be possible to use this area as open space (and indeed part of this land is floodplain) we are concerned about the residential environment that could be created given the aspect looking out onto the high voltage pylons.
5. Taken together Trade Sale Limited, as owners of the site, are of the opinion that the site allocated under draft policy SA25 is not available for development given the existing use of the site and therefore is not deliverable. The residential environment would not be appropriate meaning that the development of the site for housing would not be suitable. Additionally, there are likely to be viability issues associated with the remediation of the contamination of the site.

Question 6 – Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements?

1. We suggest that Policy SA25 be deleted from the Local Plan Part 2.

I trust that these representations are self explanatory but if there are any points that you would like to discuss further, then please do not hesitate to contact me.

Kind regards,

Yours faithfully

Fil Gray
Trade Sale Limited

Planning Policy Team
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Organisation (if relevant) Ruislip Residents Association

Agent's name and address (if applicable)

Title Mr
 First name John
 Last name Williams
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number DME4,DMH6,DMHB16,DME14-15 and DMT1
 Paragraph number See attached paper, pages 1-3.
 Table or figure number
 Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.) Please see attached paper, pages 1-3

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you No

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) Local Plan Pt 2 Submission response Mk 2 28.10.14.docx

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

What is your gender	Nothing selected
To which age group do you belong	Nothing selected
Do you consider yourself to be a disabled person?	Nothing selected
How would you describe your ethnic origin? You may wish to use one of the following categories (please tick), or add additional detail if you so wish.	Nothing selected

**Comment on Draft Local Plan Part 2 Proposed Submission Version,
September 2014**

Generally the Document is an improvement on the current UDP and provides a good basis for the future development of the area. However there are a few points which remain of concern.

Development Management Policies Document (DMPD)

Policy DME 4 - Visitor attractions - page 11, item 2.29

The Manor Farm Complex should be specifically mentioned. This is not an isolated site as it includes several visitor attractions i.e. Winston Churchill Hall, Great Barn, Cow Byre, Library, Motte and Bailey site and Manor Farmhouse Heritage Centre.

Policy DMH6 - Garden and Buckland Development – Page 35

We welcome the tightening of requirements for backland development. Though further consideration should be given to development in front and side gardens. For example, there are too many instances in Ruislip where end of terrace side extensions have been allowed. Where these have been adjacent to side roads they have had a detrimental effect on the overall street scene.

A further clause should be added in respect of front/side gardens. Where these are paved over to provide off street parking adequate landscaping should be provided to retain a suburban feel to the street scene.

Policy DMHB16 - Living Walls and Roofs – Page 55-57

We note the inclusion for this type of cladding but would caution the council against encouraging developers to adopt these systems without adequate evidence of their durability, ease of maintenance and cost effectiveness.

Policy DME15 - Green Chains – Page 80

As mentioned in email correspondence last year with Brian Whitely (20/05/13), we wish to see Policy DME15 amended to include important parts of the current UDP Policy EM2. Therefore Clause (iv) of the draft Policy should be amended as follows :
“the provision and improvement of suitable recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.”

Site Allocations and Designations Document (SADD)

Policies DME14 & 15 – Green Belt, Metropolitan Open Land (MoL) and Green Chain – List of Proposals

The proposal to upgrade the status of many of the Green Chain sites to MoL status is welcomed. However to ensure maximum protection against unsuitable development of these important sites in the future they should be given dual designation of Green Chain and MoL status. We understand there are precedents for this elsewhere in London, e.g. LB Southwark, and see no reason why the same should not apply in Hillingdon. Sites to which dual designation should be applied include the following :

Item 9 – Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway.

Item 10 - Kings College Playing Fields

This site has recently been the subject of inappropriate development proposals and it is therefore essential that the protection offered by the existing Policy EM2 should be retained as well as granting it MoL status.

Item 11 – Manor Farm and Winston Churchill Hall

The site should also be extended to include the remainder of the land enclosing the adjacent Great Barn, Cow Byre and Manor Farmhouse buildings. These are all of historic interest and are an integral part of the area.

Item 13 – Field End Recreation Ground, Ruislip Manor

(We believe this Ground is actually within Cavendish Ward in Eastcote and not Ruislip Manor).

It should be noted that this site is also adjacent to Roxbourne Park and Yeading Brook in the LB Harrow and forms an extensive area of valuable open space.

Item 15 – New Pond Playing Fields, Sidmouth Drive Recreation Grounds And West End Road Open Space

Items 16/17 – New Green Chain

We welcome the upgrade of these sites to Green Chain designation. However joint designation of MoL status should be applied for the reasons previously given (see above reference to Page 103).

With regard to item 16 (Grosvenor Vale Sports Ground) it has been rumoured for some time that this site could be the subject of redevelopment proposals. It is therefore essential that is provided with the maximum protection to ensure it continues to provide the openness and recreational facilities currently enjoyed by the community.

Items 16/17 – New Green Chains (cont)

Four other sites should be added to the list i.e.

- Bessingby Playing Fields, Bessingby Road, Ruislip Manor and Cavendish Sports Ground, Field End Road, Eastcote.

An important area of recreational land that should be given equal status to that of the other local open spaces listed above.

- Park Way Green, Park Way, Ruislip Manor.

This site was part of the land transferred by Kings College Cambridge to the RNUDC in the 1930s and should have similar protection as the remainder of that land (i.e. Kings College Fields, Manor Farm Complex etc).

The site also abuts a railway corridor which is adjacent to the small open space at Columbia Avenue, Eastcote. Together they form A Green Chain similar to that proposed in item 16 (Ruislip Green Chain Link).

- BWI School, Southcote Rise, Ruislip.

The playing field is within Ruislip Conservation Area, abuts the River Pinn Green Chain and Nature Conservation Area. It is therefore a natural extension to the Green Chain.

- Warrender Park, Myrtle Ave, Eastcote

Adjacent to the Highgrove Nature Conservation Site and Bishop Ramsey School playing fields it creates both a natural wildlife corridor and break in the urban environment.

Policy DMT1 - Key Transport Interchanges – Page 169

Ruislip Station, Station Approach, off Pembroke Road should be added to the list as it serves both Metropolitan and Piccadilly tube lines and seven bus routes.

It is therefore an important transport interchange in the north of the Borough.

JCW/RRA 02.11.14



HILLINGDON

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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Mr
First name	Robert
Last Name	Cousins
Organisation (if relevant)	Friends of Pinn Meadows
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Site Allocations Document P103 and Policy DMEI5
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Objection to i) Removing Green Chain Designation from new Metropolitan Open Land sites and ii) the weakening of Green Chain policy.

Friends of Pinn Meadows welcome the proposal to designate the Kings College Playing Fields as Metropolitan Open Land but we strongly oppose the area losing its designation as part of a Green Chain. This change would fail to take into account the important role that Green Chain links provide in forming a physical and visual break within the urban area, and thus the additional protection that is provided by Green Chain designation.

Kings College Playing Fields are part of the locally important Celandine Route, a stretch of 12 miles along the River Pinn from Pinner to the Grand Union Canal at Cowley, through green spaces, conservation areas and wildlife havens. The area forms a link between the historically important Manor Farm site to the west and Haydon Hall Park and Eastcote House Gardens to the east.

While the Local Plan Part 2 also recommends designating these areas Metropolitan Open Land, it would be a retrograde step to strip Manor Farm and Eastcote House Gardens too of their Green Chain status, as the Plan also proposes.

Dual Designation : It is our view that Hillingdon Council should look to provide maximum protection for their Green Spaces and all of these sites should remain protected by Green Chain designation in the same way that other London Boroughs such as Southwark have provided dual designation of Green Chain and Metropolitan Open Land for all of their Green Chain sites.

Indeed, dual designation should be expected for existing Green Chain areas, given that one of the accepted criteria for Metropolitan Open Land in the London Plan is that it forms part of a Green Chain and therefore dual designation could in no way detract from the effectiveness of either Green Chain or MOL policy.

Neither would dual designation cause the planning inspector any concerns, cost additional money or create additional work. MOL and Green Chain can each provide protection against inappropriate development in different circumstances, and therefore there seems no sensible justification for not deploying both in this instance.

Green Chain Policy : We also object to the proposed weakening of the wording of the Green Chain policy and wish to keep the current Green Chain Policy (EM2) which was adopted in Local Plan Part 1. This states:-

“Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.”

It is clear that the Proposed Green Chain Policy (DME15) is very similar to the earlier Green Chain Policy (OL11) which pre-dated Hillingdon Local Plan Part 1 and which the Current Green Chain Policy (EM2) was brought in to tighten up.

It now appears that the Council proposes to return to something very like the earlier, weaker policy.

The effectiveness of the present policy (EM2) is demonstrated by the succession of recent Planning Applications relating to Kings College Playing Fields, where Planning Officers accepted proposals under the earlier Green Chain policy (OL11), while an essentially similar application was later refused under the conditions of the present policy (EM2).

It should also be noted that the Planning Inspector did not see a need for a change to the existing policy EM2 when he commented in his report in July 2012 on Local Plan Part 1 as follows:-

“With regard to open space and recreation provision generally, to “green corridors” and to biodiversity matters, I find that the Policies and provisions of the Local Plan are well justified, will be effective and are consistent with the London Plan and the Framework. No significant issues have been raised that cause me to question the Plan’s soundness in these respects, and therefore no main modifications are needed.”

This makes it clear that it is not necessary to weaken the terms of Hillingdon’s current Green Chain provisions in order to take account of Government or London planning policies.

Friends of Pinn Meadows are strongly of the view Hillingdon Council should retain the wording of existing policy (EM2), which is already being applied effectively in the borough.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Kings College Playing Fields, Manor Farm, Haydon Hall Park and Eastcote House Gardens should keep their Green Chain designation alongside the Metropolitan Open Land designation.

Green Chain Policy EM2 which was adopted in Local Plan Part 1 should be retained and not replaced by the weaker policy DMEI5.

Park Way Green, Park Way, Ruislip Manor. This site abuts a railway corridor adjacent to open space at Columbia Avenue and together they form a Green Chain link and therefore this area should be given Green Chain Status

Warrender Park and Highgrove Woods are adjacent valuable Green Spaces that form a distinguishable break from the built up area as well as providing leisure facilities and a natural environment for biodiversity. This area should therefore be designated as Metropolitan Open Land.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Should it not be agreed to allow Kings College Playing Fields to keep its Green Chain designation alongside the Metropolitan Open Land designation then I would like the opportunity to make an oral representation.

Also, if the existing Green Chain policy (EM2) is weakened I would like the opportunity to make an oral representation.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

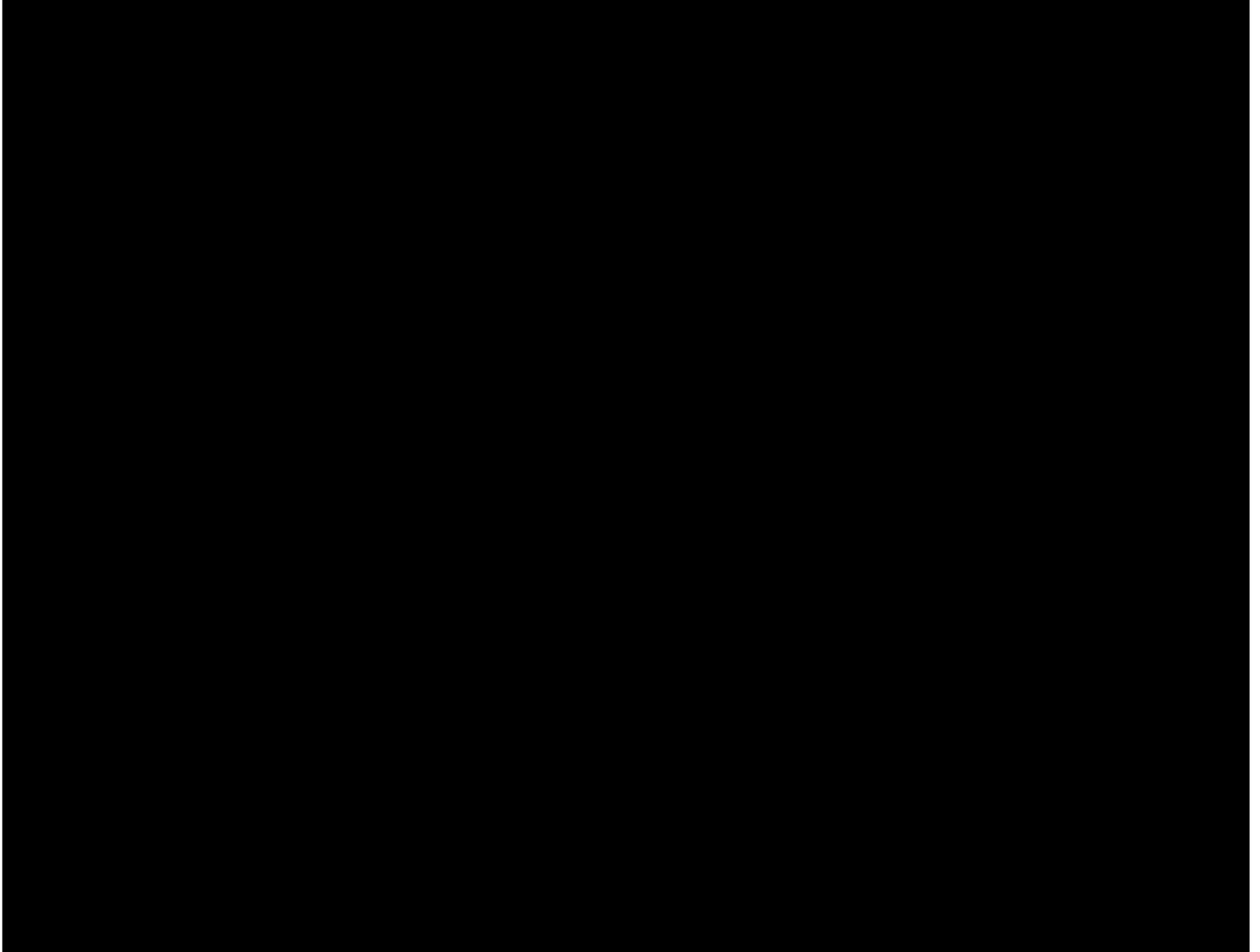
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

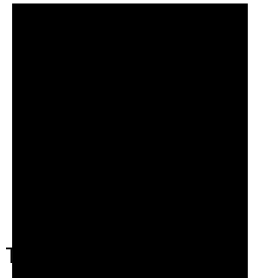
The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Date: 03 November 2014
Our ref: 3229/132786
Your ref:



Mr Jales Tippell
Deputy Director Policy & Community Engagement
Residents Services
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW



BY EMAIL ONLY

Dear Mr Tippell,

Hillingdon Local Plan Part 2

Thank you for your correspondence in respect of the above consultation document, seeking the views and comments of Natural England on the above dated.

Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations

Local Plan – Part 2 Submission Version
Chapter 5: Historic and the Built Environment

Under the streets and Public Realm section the Council should give consideration to Green Infrastructure (GI) and or soft landscaping including permeable surfaces where appropriate.

Policy DMHB 14: Street and Public Realm – (d) (iv) soft landscaping and or GI could be considered or referenced here, and consideration of linking this to Policy DMHB 16 also.

Policy DMHB 16: Living Walls and Roofs – this policy is broadly supported and the Council may wish to consider linking this policy to DMHB 14 Streets and Public Realm.

Chapter 6: Environmental Improvements

Paragraph 6.5 refers to living roofs and walls which is to be welcomed and supported and links in to Policy DMHB 16.

Policy DMEI 1: Sustainable Design Standards

Natural England welcomes and supports the inclusion of techniques that enhance biodiversity as part of a holistic approach to sustainable development.

Biodiversity and the natural environment can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. Natural England is pleased to see this recognition and encourages the Council through its Local Plan policies to ensure the borough's green infrastructure is designed to deliver multiple functions.

Sustainable Development could be strengthened further by reference to Green Infrastructure, open space and or biodiversity provision, through cross referencing sections of the document as mentioned above. References could be made to the All London Green Grid (ALGG), helping to strengthen the document further.

Policy DMEI 4: Development in the Green Belt, Metropolitan Open Land and Green Chains – this policy can be broadly supported.

Policy DMEI 5: Development in Green Chains

This policy is also broadly supported. However, the Council will need to consider whether schemes will also lead to fragmentation and potential to increase areas of deficiency.

Policy DMEI 6: Development in Green Edge Locations

The Council could strengthen this policy further by considering similar wording as per DMEI 1 regarding techniques that enhance biodiversity.

Policy DMEI 7: Biodiversity Protection and Enhancements

Natural England welcomes and supports initiatives and policies which seek to protect and increase biodiversity and ecology with the Borough.

Policy DMEI 8: Waterside Development

Broadly welcomed and supported.

Policy DMEI 9: Farm Diversification

Broadly supportive however, in respect of glasshouses, greenhouses it should be considered that when they are no longer used, they can become derelict and potentially lead to soil contamination, affecting the ability of the land to be returned to agricultural use. Sometimes the land is lost to housing, rather than agriculture and therefore the Council may wish to consider not allocating glasshouses in areas where housing would be considered to be unacceptable.

Policy DMEI 11 Water Management (Sustainable Urban Drainage systems - SUDs)

This policy is also broadly supported although the Council should consider linking this policy with other, such as DMEI 1 – where SUDs could provide potential GI links and or biodiversity enhancements.

Chapter 7 Community Infrastructure

Paragraph 7.2 refers to types of community infrastructure including public realm and open space, trees and biodiversity, this inclusion is welcomed and encouraged.

Policy DMCI 3: Public Open Space provision

This policy is broadly supported.

Policy DMCI 4: Open Spaces in new development

As above this policy is broadly supported, however, the Council should look at previously developed brown-field land initially. Green Infrastructure, including the Green Belt can be used to deliver a holistic approach to planning, providing sustainable communities, this would link into Section 11 of the National Planning Policy Framework (NPPF) “conserving and enhancing the Natural Environment”

Housing should be sited in the most suitable sites, avoiding environmental impacts of designated sites or identifies that the benefits of development would outweigh any harm – the approach should be, avoid, mitigate, compensate, in that order.

Natural England will comment on applications and developments as they are brought forward, especially those in proximity to Site of Special Scientific Interest (SSSI's) within the borough.

Natural England believes that local authorities should consider the provision of natural areas as part of a balanced policy to ensure that local communities have access to an appropriate mix of green-spaces providing for a range of recreational needs, of at least 2 hectares of accessible natural green-space per 1,000 population. This can be broken down by the following system:

- No person should live more than 300 metres from their nearest area of natural green-space;
- There should be at least one accessible 20 hectare site within 2 kilometres;
- There should be one accessible 100 hectares site within 5 kilometres;
- There should be one accessible 500 hectares site within 10 kilometres.

This is recommended as a starting point for consideration by local authorities and can be used to assist with the identification of local targets and standards. Whilst this may be more difficult for some urban areas/authorities than other, Natural England would encourage local authorities to identify the most appropriate policy and response applicable to their Borough.

Chapter 8 Transport and Aviation

Policy DMT 5: Pedestrians and Cyclists

This policy is broadly supported and the Council should consider linking these routes in to Green Infrastructure provision, supporting sustainable transport options and increasing green space provision through linking sites and facilities.

Heathrow

Natural England is aware of the proposals for Heathrow and is in discussion with the Airports Commission and prospective developers and will be replying separately as appropriate.

Site Allocations and Designations

Chapter 3: New Homes

See our comments above in respect of Accessible Natural Green Space (ANGST) standards, new developments provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes, together with green space provision. The Council should also consider the issue of fragmentation of existing sites through development proposals and recreational pressure on same.

Chapter 5: Green Belt, Metropolitan Open land, Green Chains, nature Conservation

Natural England has no substantive comments to make in respect of this chapter, but is broadly supportive of the approach by the Council.

Sustainability Appraisal

Chapter 4: Sustainability Appraisal Framework

Seventeen sustainability objectives are listed which can be broadly supported.

Chapter 5: Other Plans and Programmes

The Council has identified appropriate and relevant plans and programmes in respect of this document.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

For clarification of any points in this letter, please contact David Hammond on [REDACTED]. For any new consultations or issues, please contact [REDACTED].



Yours faithfully

David Hammond
Lead Advisor
Sustainable Development and Regulation
Thames Valley Team



SUSTAINABLE DEVELOPMENT - PLANNING POLICY

London Borough of Hillingdon
Planning Policy Team
FAO Jales Tippell

Dealt with by: Hannah Butterfield
Your Ref:
My Ref:
e-mail: 
Direct Line: 
Date: 3 November 2014

Dear Jales,

Publication of the Local Plan Part 2

Thank you for consulting South Bucks District Council on the above document. We would like to make a few observations as a neighbouring local planning authority and in the spirit of Duty to Co-operate.

We note that the Local Plan Part 2 will deliver the detail to the policies set out in the Part 1 Local Plan which was adopted in 2012, and consists of the Development Management Policies, Site Allocations and Designations and the Policies Map.

Our main concern with the plan is the proposal to retain the existing housing figure of delivering 425 units per annum, as set out in your adopted Local Plan Part 1. We are concerned that this is inconsistent with the GLA Further Alterations to the London Plan (FALP) proposals which sets out a figure for Hillingdon to 2025 of 559 units per annum. The existing London Plan (and proposed FALP) expresses housing figures as a minimum in the context of growing housing need in London and there are also more recent DCLG population and household projections emphasising this growth and need. We also note that your Council currently has not produced a Local Development Scheme for the review of Part 1 and so the issue of the relevance of Part 1 housing figures today is questioned for the Local Plan Part 2.

The FALP states that the Mayor of London is planning on delivering a minimum housing need of 49,000 homes per annum across London. The plan itself is inconsistent as it refers to a minimum figure of 42,000 to be planned for (in Policy 3.3), therefore creating an immediate shortage of 7,000 homes per annum. With this in mind, it is inevitable that the London wide figures are likely to increase and boroughs will have to plan for additional housing. We feel therefore that Hillingdon should be making provision for the rise in housing figures for the length of their plan. Indeed, Policy 3.3 Increasing Housing Supply of the adopted London Plan (2011) and the proposed FALP sets out that:

“Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1 and, if a target beyond 2021 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.”*

*additional words subject to the FALP being adopted

We note that Hillingdon objected to the proposed figures set out in the FALP, and that the plan is yet to be adopted, however feel that Hillingdon should be taking the opportunity in planning to accommodate some of the known London wide shortages by seeking to allocate further sites through your site allocations and designations. This would be consistent with the London Plan, emerging FALP and importantly the National Planning Policy Framework in seeking to boost housing supply.



Other comments in relation site allocations are that we note there are a handful of sites either bordering or near to our shared authority boundary. We would like to stress that each of these developments (namely housing) should ensure that proposals account for their infrastructure and service requirements, thereby ensuring that undue pressures are not placed on the infrastructure and services of South Bucks.

I hope you find these comments helpful. Should you have any queries, please contact a member of the Planning Policy Team using the contact details above.

Yours sincerely,

Hannah Butterfield
Senior Planner, Policy



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	PROLOGIS		
Unit		House number	
House name			
Address 1	C/O AGENT		
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	MR		
First name	NICK		
Last name	GREEN		
Company	SAVILLS		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	PLEASE REFER TO ATTACHED LETTER
Paragraph Number; or	4.20 TO 4.22, 4.25, 4.26
Table or Figure Number; or	PLEASE REFER TO ATTACHED LETTER
Map Number (Atlas of Changes)	PLEASE REFER TO ATTACHED LETTER

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	YES	NO
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input checked="" type="checkbox"/>	It is not consistent with National policy

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

PLEASE REFER TO ATTACHED LETTER

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

PLEASE REFER TO ATTACHED LETTER

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

--

--

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

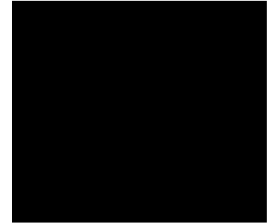
a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group

4 November 2014
Draft Reps Letter November 2014 NG

savills

Planning Policy Team
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Nick Green



Dear Sir/Madam

Stockley Park Phase 3: London Borough of Hillingdon Local Plan Part 2, Proposed Submission Version, Statement of Representation Procedure (Regulation 19 of the Planning and Compulsory Purchase Act 2004 (as amended) Town and County Planning (Local) Planning Regulations 2012), Stockley Park Locally Significant Employment Location.

I write on behalf of our client Prologis, in order to submit formal representations under Regulation 19, with regards to the westernmost parcel of the proposed Stockley Park Locally Significant Employment Location (LSEL), known as the 'phase 3 site'. Part of the site is proposed to be allocated within the Hillingdon Local Plan Part 2: Site Allocations and Designations (Proposed Submission Version, September 2014).

We are of the view that the draft Plan is unsound because it is:

- Not justified
- Not positively prepared
- It fails to take account of national policy.

This is explained further below.

Background

Prologis purchased the freehold of the phase 3 site in September 2014. The land has remained empty and unused for many years and Prologis intends to bring forward a comprehensive development scheme for employment and logistics purposes. A site location plan is attached with this letter.

Prologis

Prologis is well known to LB Hillingdon as a developer and owner of a number of industrial and logistics assets which provide significant levels of local employment. The company is highly experienced in the development, ownership and management of key industrial assets, which is evidenced by its large property portfolio of over 23m sq ft in the UK and across 21 countries. Prologis has the resources and experience to deliver a complex development, and retains a long term interest in their sites post-development in the capacity as a landlord, commonly leasing their buildings to blue chip companies.

The site

The Phase 3 site extends to approximately 12 ha. The site is rectangular in shape and is bounded to the south by the Grand Union Canal, the west by industrial properties fronting Horton Road, the north by Horton Road and the east by Ironbridge Road. The eastern area of the site measuring 4.4ha is designated in the

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Registered office: 33 Margaret Street, London, W1G 0JD





current UDP as an Industrial and Business Area (IBA). The remainder of the site is designated in the current UDP and Local Plan Part 1 as Metropolitan Green Belt.

A key feature of the site is the raised plateau running through the centre, grading out the gentle level change from the north-eastern corner to the south-east corner close to the Grand Union Canal, supported by vertical sheet pile walls. Upon this plateau, and within the site, an internal road network has been set out, with a connection established with Ironbridge Road in the south-west corner of the site.

In terms of the wider area, the site is located just to the west of the A408 Stockley Road, less than 1 km north of the M4 Junction 4 (Heathrow junction). West Drayton mainline station (which will be served by Crossrail in 2018) is a short distance to the west of the site and is easily accessed by cycle or foot along the canal path and by car and regular bus services along Horton Road. Three TfL bus routes run through Stockley Park, with bus stops distributed throughout Phases 1 and 2 and at the northern boundary of Phase 3 (Horton Road).

Stockley Park Phases 1 and 2 to the east of the site is predominantly characterised by a range of large low rise office buildings ranging from two to four storeys, set within extensive landscaping and car parking. Between the Grand Union Canal and the mainline railway, to the south of the site, is a belt of industrial units ranging in size, set amongst extensive industrial yards including both car parking and goods storage. To the west of the site, along and off Horton Road, is a mix of one to two storey industrial and commercial premises. Stockley Park Country Park and Golf Course, an extensively landscaped public park built on top of the northern extents of the old landfill site, is immediately to the north of the site, across Horton Road.

Further to the south of the site, beyond the canal and railway, there is an area of residential properties, including a new development on a former RAF station site. Industrial and commercial uses continue south along the line of Stockley Road towards the M4, including estates developed by Prologis and Segro, Heathpark Golf Course and two hotel developments

Planning history

The Phase 3 site has a complex planning history. It is part of the original masterplan for Stockley Park, the initial outline planning permission for which was granted in 1984 (ref: 37933C/89/397). However, whilst phases 1 and 2 (and part of Phase 3 known as phase 3A) were successfully built out in the subsequent years, the land comprising phase 3 was never implemented.

Since the original planning permission there have been two key applications on the phase 3 site, one in 2000 (which gained planning permission and which was partially implemented), and a subsequent one in 2009 (for which the LPA resolved to grant permission in 2010 but which was subsequently withdrawn).

The first of these was an outline planning permission which was granted in 2000 for the development of Phase 3 for business purposes. The description of the proposals was for 50,000m² of industrial and/or offices and/or research and development and/or training together with other uses ancillary to any of these uses with a maximum parking provision for 1143 cars

Reserved matters were approved shortly afterwards, which provided details of 5 office buildings on the site. It is clear that this planning permission was implemented through the construction of access and estate roads, together with the setting out of structural landscaping. We therefore understand that the permission remains extant and that it would be capable of completion.

The second application was submitted in 2009 for the comprehensive development of the phase 3 site for mixed use purposes. The proposal was for:

- 25,000 sqm office space (Class B1)
- 26,000 sqm 450-room hotel, including leisure facilities and energy centre (Class C1)
- 18,135 sqm data centre (Sui Generis)
- a single storey car parking building



- 3,500 sqm mixed use building accommodating office (Class B1), non-residential institution including art exhibition space (Class D1), retail (Class A1), financial and professional services (Class A2) cafes and restaurants (Class A3)
- associated car parking and landscaping

The Council resolved to grant planning permission in July 2010, and the Mayor of London subsequently issued a stage 2 sign off on 1 September 2010. However, although negotiations took place in respect of the s106 Agreement, the application was withdrawn on 6 September 2011.

Draft Policy Site Allocation

The Local Plan Part 2: Site Allocations and Designations (Proposed Submission Version, September 2014) proposes to designate the borough's existing areas of employment land as either Locally Significant Industrial Sites (LSIS) or Locally Significant Employment Locations (LSEL), including the designation of additional areas of employment land.

Specifically, the Local Plan Part 2 proposes to allocate the entire existing Stockley Park as a Locally Significant Employment Location (LSEL). The sub text to the designation (4.25) sets out (*inter alia*) that the Council's intention is that the site should continue to primarily accommodate B1(a) office uses, and that other employment uses such as B2 and B8 will be encouraged to locate to more appropriate areas in the borough, due to their impact on the integrity of the site as a high quality strategic office location. The sub text further sets out that the most appropriate location for a hotel would be Site 3.

With regards to Phase 3, the Local Plan Part 2 proposes to allocate the same area of land as a LSEL as the existing IBA allocation, that being the eastern 4.4ha of the site. The remainder of the site has been excluded from the allocation and is proposed to remain as Metropolitan Green Belt.

Representations

We do not consider that the Phase 3 site should be included in the designation as a LSEL, which supports a narrow range of business uses, as to do so would be unsound. We note that the draft policy (paragraph 4.21) states that the designation of existing Industrial and Business Areas as either Locally Significant Employment Sites or Locally Significant Industrial Sites depends on whether the focus of the sites is either industrial in nature or relates to other employment generating uses. However, Phase 3 has never been in employment use. It has lain vacant for the past 30 years and has never been developed for employment uses, despite benefiting from planning permission for a mix of uses including employment. It is therefore a 'new' site ready to be taken up for economic development.

The draft designation does not therefore take into account the particular site circumstances. Prologis want to develop this long term vacant site for logistics uses, which will provide employment and economic benefits to the area. However the designation as currently worded would not assist in bringing forward the economic development that is envisaged. This fails to take account of paragraph 22 of the NPPF which states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

We consider that Phase 3 should have a more flexible allocation to include industrial or logistics employment uses, in addition to B1 uses. It should be noted that paragraph 4.21 of the draft policy acknowledges that in many cases, Locally Significant Industrial Sites have a close relationship with significant employment locations. It should also be noted that paragraph 3.3.5 of the 2014 Employment Land Review states that Hillingdon is recognised as a key location for continued airport related growth, particularly with regard to transport and logistics, business and hotel and leisure and tourism.

Work by Savills research team indicates that in the local market area (i.e. Uxbridge, Datchet, Colnbrook, Langley, Poyle, Heathrow, Hounslow, Feltham, Staines, Hayes), there is a shortage of supply for >5,000 sq m industrial space (i.e. B1c, B2 and B8), and an adequate supply of B1 office space. This is set out in the

attached table, which indicates a sub-1 year supply of the former and a 4.6 year supply of the latter, excluding pipelines. The Local Plan acknowledges this to a large extent and states that current need for office space is limited (para 5.20), and this is likely to have been a contributing factor to explain why the site has failed to come forward for office development. Nevertheless, there is clearly a need to find additional land for logistics or light industrial purposes, and the site presents an excellent opportunity to meet this need with a well-designed, high quality scheme.

Therefore we consider that a flexible allocation for Phase 3 would therefore be more positively prepared, justified and consistent with national policy than that which is currently proposed.

Secondly, we do not consider that the extent of the site allocation is sound, as it does not take into account the planning history of the wider site, the particular site characteristics and land ownership. We note that the September 2013 Draft Proposed Site Allocations and Designations Consultation Document included the entire of Phase 3 within the proposed LSES designation. This designation has been re-drawn in the current consultation to remove the western bounds of Phase 3 from the LSES designation. We can find no explanation for this amendment and consider it unsound to have done so without sufficient justification.

It should be taken into account that the site has the benefit of a planning permission for the development of the entire site for Class B1 purposes. As is apparent, the site has been landscaped and had the relevant infrastructure (roads and groundworks) laid out for this consent. This permission has therefore been implemented. This principal has been reinforced more recently by the resolution in 2010 to grant planning permission for the 2009 mixed use proposal. The development of the entire site is clearly part of the strategy for the borough. It is unusual for a site which is so plainly intended to be comprehensively developed to remain within the Green Belt. The Local Plan offers the opportunity to reconcile this anomaly, yet it does not take into account the fact that the site has a partially implemented planning permission for development.

We do not consider that the west part of the existing site forms any of the five purposes of the Green Belt as set out in the NPPF. It is closed to the public and does not form part of Stockley Country Park to the north and in this respect its development would allow the wider Green Belt to continue to restrict the sprawl of built up areas, or of towns merging into one another. It is not open countryside, rather is an engineered and artificially landscaped area of land that does not assist in safeguarding the country side from encroachment. It does not lie close to any, or preserve the setting of any historic towns. We consider it to be surplus urban land and therefore we consider that its development will assist in urban regeneration. We therefore consider that the site allocation for Industrial and Employment uses that only covers the eastern element of the site is unsound as it fails to take into account the particular site circumstances and is not positive.

Summary

To summarise, Stockley Park Phase 3 is clearly entirely different from the remainder of the proposed site allocation. It has never been utilised for employment uses despite being allocated for such uses for the previous 30 years and having the benefit of a partially implemented planning permission for office use. Although it forms part of the Green Belt it is not considered to fulfil any of its purposes, rather it is an engineered and artificially landscaped site. We do not consider that the proposed allocation of a portion of the site as a Locally Significant Employment Site is sound for the following reasons:

- The proposed allocation has not been positively prepared. To allocate the part of the site as proposed would likely hinder the development of this long term vacant site for beneficial economic uses, which will provide employment and economic benefits to the area. The removal of the western bounds would also significantly reduce the developable area of the site from either employment or industrial development, which would restrict future economic development in the borough.
- The proposed allocation of Phase 3 has not been properly justified. The allocation as a LSES does not take into account the particular circumstances and planning history of the site. The site has clearly never been used for employment purposes and there is no evidence to suggest it will come forward for office



uses in the future. The site allocation does not take into account the implemented consent across the entire site and does not justify the reduction in the area of the site allocation.

- The proposed allocation does not comply with national planning policy. The allocation of the site in its current form would not assist Prologis in providing a high quality employment generating development. This is also contrary to paragraph 22 of the NPPF which sets out that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. This is contrary to paragraph 156 of the NPPF which requires Local Plans to plan positively for the development and infrastructure required in an area.

Taking the above into account, we would therefore request that the format and extent of the designation of Phase 3 of the Stockley Park LSEL is reconsidered in order to provide a designation that is fully justified, positive and in compliance with National Policy.

I trust that the above is in order. In the meantime if you have any queries please do not hesitate to get in contact.

Yours faithfully,



Nick Green
Director

Enc.

Industrial (B1c/B2/B8)

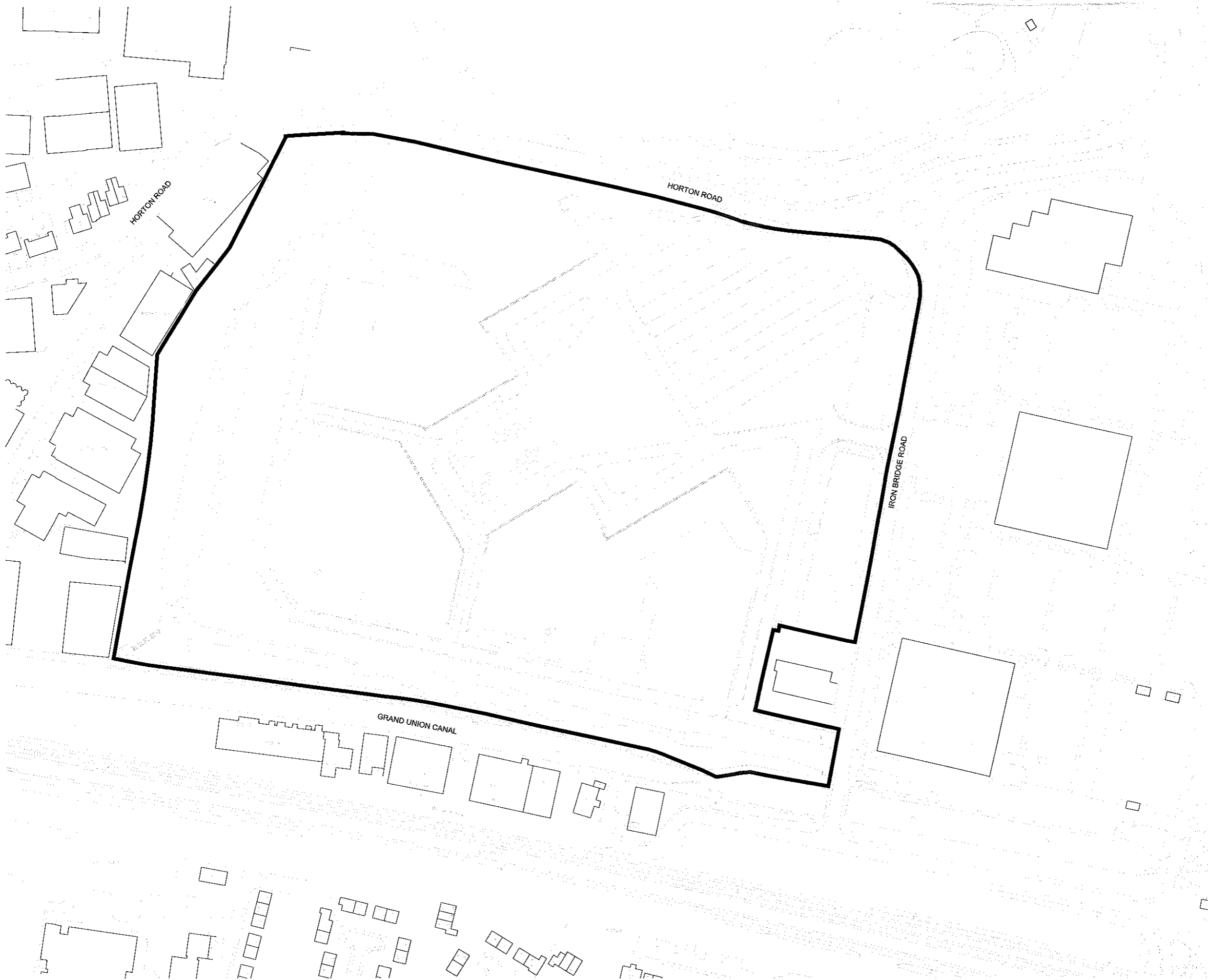
Heathrow market area (Uxbridge, Datchet, Colnbrook, Langley, Poyle, Heathrow, Hounslow, Feltham, Staines, Hayes)

	2011	2012	2013	3-yr average
50,000 sq ft+				
Grade A take-up	411,675	292,224	122,992	275,630
Grade A availability				
As at mid-2014	139,964			
Years of supply				
Using 3-yr average	0.5			
Pipeline (with completion date)				
Pipeline (in planning)	102,900	0	0	0
	-	-	-	-
				690,000
Years of supply (including dated completions)				
Using 3-yr average	0.9			
Years of supply (including all pipeline)				
	3.4			

Offices (B1a)

Heathrow market area (Uxbridge, Datchet, Colnbrook, Langley, Poyle, Heathrow, Hounslow, Feltham, Staines, Hayes)

	2011	2012	2013	3-yr average
20,000 sq ft+				
Grade A take-up	141,848	117,459	437,903	232,403
Grade A availability				
As at mid-2014	548,148			
Years of supply				
Using 3-yr average	2.4			
Pipeline (with completion date)				
Pipeline (in planning)	155,382	0	370,000	0
	-	-	-	-
				749,000
Years of supply (including dated completions)				
Using 3-yr average	4.6			
Years of supply (including all pipeline)				
	7.8			



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 FIGURED DIMENSIONS TAKE PRECEDENCE AND NOTIFY
 MICHAEL SPARKS ASSOCIATES OF ANY DISCREPANCIES



LEGEND:

PHASE 3
 12,008 Ha / 29,67 acres

REV	DATE	NOTE	DRAW	CHECK

MICHAEL SPARKS ASSOCIATES
 Chartered Architects
 11 PLATO PLACE
 STADIUMS ROAD
 LONDON SW6 4TU
 TELEPHONE 020 7736 6182
 FAX 020 7736 3035
 www.msa-architects.co.uk



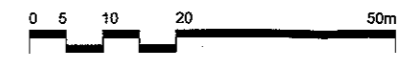
TITLE
PHASE 3, STOCKLEY PARK
 DRAWING
SITE LOCATION PLAN

CLIENT
PROLOGIS UK LTD

DATE	SCALE	DRAWN
NOV 2014	1:1000	PF
	STATUS	CHECKED
	FEASIBILITY	MS

DRAWING NUMBER
27122 / FE / 034

01
 34
SITE LOCATION
 1:1000



DE/1732A/27(03November14)Hillingdon

SENT BY EMAIL

Email: localplan@hillingdon.gov.uk

Planning Policy Team
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

3 November 2014

Dear Sir / Madam

**HILLINGDON – LOCAL PLAN PART 2 DEVELOPMENT MANAGEMENT POLICIES
CONSULTATION, SEPTEMBER TO NOVEMBER 2014
COMMENTS ON BEHALF OF WM MORRISON SUPERMARKETS PLC**

With reference to the above and on behalf of our client, Wm Morrison Supermarkets Plc (hereafter referred to as Morrisons), we write to thank you for providing us with an opportunity to comment on the Development Management Policies Proposed Submission Version.

Our client would therefore like the comments below carried forward on the current consultation document as set out below.

Morrisons OBJECT to **Policy DMHB16: Living Walls and Roofs**.

In line with national planning policy, local policies should concentrate on guiding scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally. **Paragraph 59** of the NPPF states that *'design policies should avoid unnecessary prescription or detail'*.

Managing Directors: Chris Creighton BA (Hons), MTP, MRTPI
Mark Eagland BA (Hons), MTP, MRTPI
Directors: Steve Buckley BA (Hons), BPI, MRTPI
Ed Kemsley BA (Hons), Dip TP, MRTPI
Senior Associates: Anthony Ferguson MA (Hons), MRTPI
Cara Ware MTCP (Hons), MRTPI
Associates: David Armstrong BA MRUP, MRTPI
Gareth Glennon BA (Hons), MA, MRTPI
Lorraine Kelly BA MSc, MRTPI
Sarah Worthington MPhil (EnvPI), MAUED, MRTPI
Consultants: Robert Smith Dip TP, MRTPI
Peter R.B. Wood Dip TP, MRTPI

London Office Address:

Morrison's consider that the policy seeks to impose unnecessary detail and is in conflict with **Paragraph 59** of the NPPF.

Morrison's also consider that the policy is in conflict with **Paragraph 60** of the NPPF which states that *'planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.'*

Living walls and roofs are a relatively new concept and as such are not part of the local distinctiveness. The policy is in effect seeking to impose particular tastes upon development and is therefore in conflict with **Paragraph 60** of the NPPF.

There are a number of disadvantages associated with the installation of a living roof. These can impact upon the overall sustainability of a development project.

In order to cope with the additional weight load of a living roof, the roof structure needs to be significantly stronger than a standard roof. The exact strengthening methods and materials will vary dependent on the depth of the living roof and the types of planting. This raises issues which will need to be accounted for in viability appraisals.

Commercial buildings from the first half of the 20th century are often ideal for purpose but modern lightweight steel structures may not even support the simplest green roof without substantial alterations to the construction methods and materials. The carbon cost of adapting a modern building would outweigh any benefit.

Added to the construction issues, living roofs also require ongoing maintenance in addition to that required for the roof.

Many buildings often require plant equipment, for example air conditioning units, to be sited on the roof. The plant equipment requires access and regular maintenance and would need to be taken into account in the provision of a living roof.

The draft policy effectively elevates living roofs over all other types of sustainable development options - for example, solar panels can provide many benefits and are a good source of renewable energy. It is likely that solar panels would be incompatible with a living roof. It is important to consider all types of sustainable construction and energy generation which may be best suited to the specific situation and intended outcome rather than imposing a preferred design.

To summarise, the following issues are raised in this objection:

- Conflict with Paragraph 59 of the NPPF
- Conflict with Paragraph 60 of the NPPF
- Additional construction and maintenance costs with subsequent sustainability considerations
- Plant equipment is often sited on roof space
- Other types of sustainable development may be more suitable

We trust that this is helpful and would be grateful if you could ensure that Peacock and Smith are kept informed on the progress of the Development Management Policies DPD. However, if you have any queries regarding the above, please do not hesitate to contact Dan Elvin.

Yours faithfully



PEACOCK & SMITH

JAL/lh/1020/61/1

03 November 2014

Planning Policy Team
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Dear Sir/Madam

RE: HILLINGDON LOCAL PLAN PART 2 REGULATION 19 PROPOSED SUBMISSION VERSION REPRESENTATIONS ON BEHALF OF HPH A LTD IN RELATION TO RACKSPACE CITY (FORMERLY KNOWN AS HYDE PARK HAYES), MILLINGTON ROAD, HAYES

We act on behalf of HPH A Ltd and write in respect of the above consultation. We request that the contents of this letter, setting out representations, on behalf of our client, to the Proposed Submission Local Plan Part 2, are taken into account as part of the current Regulation 19 consultation. The demise of our client interest, at Rackspace City (formerly known as Hyde Park Hayes) is detailed on the enclosed plan (ref: 1020/61/1_SLP05).

The rebranding of the site, from Hyde Park Hayes, reflects the current office accommodation on the site is occupied by Rackspace Ltd as its UK headquarters. Rackspace are the global leader in cloud-based services, and currently employ over 1,000 people on the site. Rackspace are already one of the major employers in the Borough, and are continually expanding their presence on the site (see details of recent consents below). Rackspace have, therefore, occupied the space left by Safeway (who occupied the site as their headquarters until 2003, and before the site was re-branded to Hyde Park Hayes), after a number of years of vacancy and under use.

As you are aware, we have previously provided representations, on behalf of HPH A Ltd, in respect of the Local Plan Part 2 initial consultation (Regulation 18) and “call for sites” in May 2013. As with our previous representations, these representations to the current consultation seek to ensure that the site can continue to evolve and thrive, in the interests of promoting the wider regeneration of Hayes. In these terms, we request that the contents of this letter are taken into account.





Background

RackSpace City is a 10 acre business campus which currently comprises 3 office buildings (buildings 1, 2 and 3), and associated car parking facilities. In addition, there are three development plots, (known as plots 4, 5 and 6). Planning permission was granted on 9 September 2013 for approximately 20,846 sq.m Class B1(a) office space on plots 4 and 5, and the consented office building is currently under construction on the latter, and on completion will accommodate additional floorspace for RackSpace. Although it is intended that plot 4 is built out in accordance with the aforementioned consent, this cannot be guaranteed at this stage. In these terms, it is critical to the continued success of the site that the ability to build this plot as office space is retained.

Plot 6 (as detailed on the enclosed plan ref: 1020/61/1_SLP05) represents the final plot at RackSpace City to be developed. It historically accommodated a pre-war building known as Mercury House, which was used as ancillary office accommodation to the former Safeway Headquarters. This building became vacant in 2003, and was demolished in 2007. Since 2005, the Hyde Park Hayes site has been marketed for employment uses, to date, the site has attracted interest from hotel and self storage occupiers but not from potential B1 occupiers.

Plot 6 is in a highly accessible location, with Hayes and Harlington Station approximately 400m away, and Hayes Town Centre a similar distance away. Bus stops are located immediately to the north of the development site on North Hyde Road. The area is also rapidly evolving, in the context of development at RackSpace City and the Asda mixed use proposals. In light of this, it is critical that planning policy allows sufficient flexibility for a variety of commercial and employment generating development, in order to ensure that market demand for the site guides its final use.

Possible future uses of the site, which would compliment the surrounding area, could be “amenity” or “service” uses to support the Millington Road area (for example, small scale retail, restaurant use, a hotel or a gym). These uses would all make office and employment floorspace in the surrounding Millington Road mixed use area more attractive to occupiers. Alternatively, the site might be suitable for additional office space (possibly in combination with a supporting use, as detailed above) to allow RackSpace to grow further, if necessary. It might also be appropriate for the site to accommodate other “B” class uses, or related uses such as a car showroom.

Representations on Local Plan Part 2

It is understood that the Local Plan Part 2 comprises three documents released for consultation, and we comment as follows:

Proposals Map

We note that both RackSpace City and adjacent Asda/mixed use site are “white land” and do not have any specific allocation within the development plan. This is welcomed, subject to the proposed amendment of Policy DME3 and the comments relative to the allocation of plot 6, which are detailed below.



Development Management Policies

In the context of the above, we consider that the Development Plan should recognise the existing and approved uses on site and identify Rackspace City as being a key office location, outside of other identified strategic employment designations. We consider that it is appropriate to provide policy support for the prosperity and growth of high quality office sites such as Rackspace City.

Policy DME2 (Employment Sites Outside Designated Employment Areas) should be amended to explicitly state that it is not relevant to employment sites which have been vacant/unused for significant period of time (10 years). On such sites, alternative uses should be considered acceptable in principle.

Policy DME3 (Office Development) Part A should specifically include Rackspace City as an appropriate location for new office space. We consider that the policy should confirm that redevelopment of land within Rackspace City for office purposes (including floorspace additional to that existing and within the consented scheme) will be acceptable in principle, in order to ensure that the campus can evolve and thrive, to secure additional jobs in the area, and to promote the continued regeneration of Hayes.

In addition to the above comments, a number of the policies within the Development Management Policy Document are considered too restrictive and they would place unnecessary barriers to economic development carrying forward. Policies DMEI11 (Water Management) and DMEI16 (Water Efficiency in Non Residential Developments) should be amended to confirm that measures will be informed by sites and, development specific considerations. In addition, Policy DMHB16 relative to Living Walls and Roofs should be explicit that not all development is appropriate for these measures.

Site Allocations and Designations

Plot 6 represents the only undeveloped site within Rackspace City, which is a vibrant office and mixed use area. Given that the site is previously developed land in a highly accessible location, it is clearly ripe for development that would contribute to the economic growth of the area. Further to the reasons set out in this letter and in the context of our representations of May 2013, it is considered that the site should benefit from its own site allocation.

The allocation should be clear that the final use should take into account, and complement, the surrounding Millington Road area. It should therefore confirm that the site is appropriate for a number of uses defined as “economic development” in the National Planning Policy Framework, including B class uses as well as “amenity” or “service” uses to support the wider Rackspace City Campus, for example leisure and small scale retail (potentially in combination with office space, which would be much more attractive to occupiers with such amenities).

However, given current and future development in the area, it is not appropriate to “fix” a specific use to the area at this stage. Instead, the appropriate final use will be informed by market forces, in light of the evolution of the Millington Road area from an employment area towards a more mixed use character. The allocation should make allowance for this.



Summary

We respectfully request that the Council recognises the significant importance of Rackpace City as a key economic and employment provider in the Borough.

In summary, our client feels that the Local Plan Part 2 is broadly sound, subject to a number of key amendments. Specifically, Policies DME2 and DME3 (and others) should be amended to provide a policy framework, which promotes economic growth and development whilst ensuring that there is sufficient flexibility to adapt to changes in market demand in the future. In addition, we request the allocation of plot 6 in order to support the continued redevelopment and expansion of the site.

We therefore trust that the Council considers our representations in full and relative to those objections, and that these will be reflected in the next stage of the Local Plan Part 2. In addition, we request that we are notified of progress of the document and participation in the Examination hearings.

In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise. Please send all correspondence marked for the attention of Rebecca Gunn at our London office.

Yours faithfully

Rapleys LLP



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)			
Unit		House number	
House name			
Address 1	c/o Agent		
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Miss
First name	Rebecca
Last name	Gunn
Company	Rapleys LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME3
Paragraph Number; or	
Table or Figure Number; or	MAP 1.1 Overview Map and Hayes West
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please refer to the accompanying covering letter.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

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<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME2
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI11
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI16
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

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N/A

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(please tick relevant box)

Local Plan Part 2	
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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB16
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

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<input type="checkbox"/>	No, I do not want to participate in the oral examination
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N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

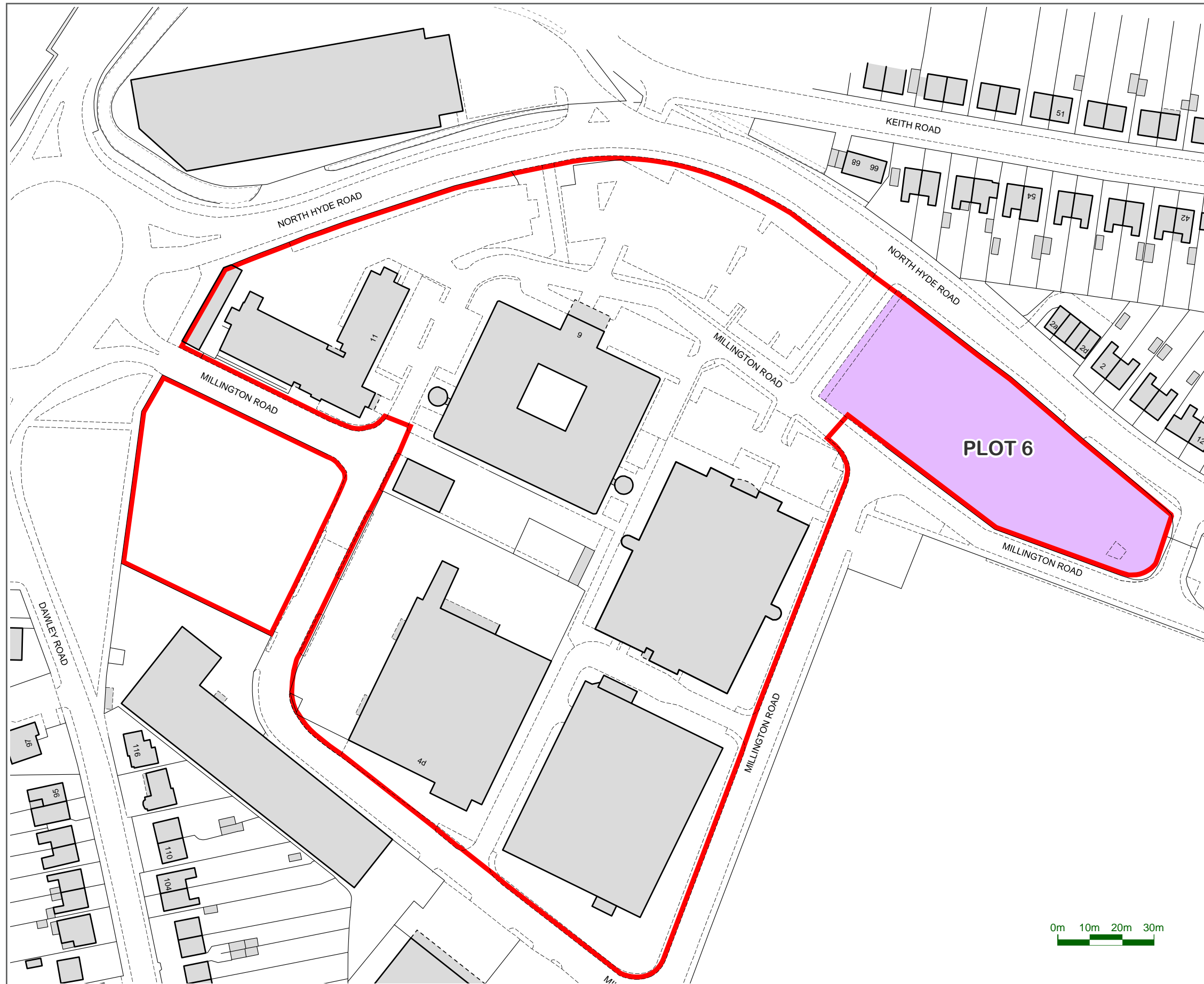
Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.



SITE LOCATION PLAN



Scale @ A3 : 1:1250

Plan No. : 1020/61/1_SLP05



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HILLINGDON

Comments

Chapter 6

ENVIRONMENTAL IMPROVEMENTS

1. Policies

- DMEI-1**
- DMEI-2**
- DMEI-3**

These policies are specifically targeted at built development in the form of buildings and are not believed to be directed at 'operational' or 'engineering' types of development. The operational activities, which include 'mineral development' should be excluded from these specific policies. This can either be done as a statement in the text, i.e. at para. 6.1 or as a new paragraph after Policy DMEI-3 saying

'These policies do not apply to operational development including mineral extraction, land reclamation and other engineering activities where there is no permanent residential, commercial or industrial development'.

Green Belt

This section does not refer to certain activities that are NOT inappropriate within the Green Belt, namely Mineral Extraction and its associated / ancillary activities, and engineering operations. These activities need to be added to this section to make it clear that they can take place in the Green Belt and Metropolitan Open Land.

Minerals

Para. 6.60

The paragraph refers to the Council needing to 'ensure it has permitted reserves amounting to a total of 1.75 million tonnes'. This is based on The London Plan (policy 5.20). This says that Hillingdon should make provision for a landbank of 'at least' 1.75 million tonnes. Paragraph 6.60 should be amended to confirm the council will ensure it has permitted reserves of at least 1.75 million tonnes (i.e. delete 'to a total' and replace with 'to at least').

MIN 1

The sites identified in Policy MIN 1 for mineral extraction are supported. However Policy MIN 1 should be titled 'Preferred Areas for Minerals' as this reflects the advice in the NPPF at para. 145 bullet point 3. The use of 'Safeguarding' is to protect known mineral sites from 'needless sterilisation' (NPPF para. 143 bullet point 3) which notes that such safeguarded sites do not create 'a presumption that resources defined will be worked'.

MIN 3

The policy as written does not reflect NPPF Guidance at para. 143 bullet point 5. This states that where non-mineral development is proposed on land that is known to have a specific mineral resource (see NPPF, para. 147 bullet point 3) then prior extraction is 'encouraged' (not 'required'). The prior extraction has to be evaluated against whether it is practical, which applies equally to mineral extraction as well as the impact of delivering the non-mineral development. It also has to be environmentally feasible with regard to the impacts of the prior extraction. In other words the test is one of 'balance' and equal weight needs to be given to the non-mineral development.

Policy MIN 3 needs to reflect NPPF advice and to make clear that if there is a recognised need for the non-mineral development that prior extraction will not result in the site being rendered unsuitable for the non-mineral development. The introduction of the test of 'overriding' is not found in the NPPF and puts an unreasonable burden on the developer.

MIN 10

Refers to MPG11 which was withdrawn on the publication of the NPPF and the policy should refer to the Technical Guidance.

DKS/yw/
4 November 2014



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House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mrs
First name	Sarah
Last name	Brown
Company	Solent Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA29
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The allocation of land at the Rainbow and Kirby Industrial Estates at Trout Road in Yiewsley under Proposed Allocation SA29 is **supported** and wholly consistent with planning permission 38058/APP/2013/1756 which was granted for the residential led mixed use development of the site in July 2014.

This representation relates to the detail of the proposed allocation. Essentially, it is considered that the allocation reflects the detail of the planning permission. However, it is considered that the site is suitable for a pure residential development of approximately 200 units.

The NPPF sets out the general presumption in favour of sustainable development. Paragraph 22 emphasises that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities

Paragraph 51 states that local planning authorities should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.

Further policies 3.3 and 3.4 of the London Plan emphasise the pressing need for more homes in London and optimising housing potential. Policy 4.4 and supporting text states that redevelopment of surplus industrial land should address strategic and local objectives particularly for housing.

It is considered that the wording of the proposed allocation does not maximise the potential for residential development on this redundant employment site and as such is considered not to be sound in its current form.

The updated Employment Land Study which has informed the preparation of the allocation process has confirmed that the surplus employment land for the period 2011-2026 may now have increased from 17.5 ha to 20.6 ha. Further it specifically recommended the release of the employment land at Trout Road. As such, this emphasises the over supply of employment land and the potential to achieve further residential development on sites such as the Rainbow Industrial Estate SA29.

All but a very small eastern section of the site is located outside the defined District Centre (as defined within Appendix B of the Development Management Policies document) but in proximity to the local services and facilities. In accordance with guidance in the NPPF such sites have significant potential to be built out fully for residential development. Redevelopment of this site with benefits for environmental conditions, the appearance of the area and additional benefits such as enhancements to the adjacent canal will still benefit the local area of Yiewsley significantly even if no commercial element is retained or retain element proposed.

Viability is a key issue and whilst it was initially envisaged that commercial and retail uses would be provided on the site there is considerable concern that this may affect the viability of the site to be built out as a whole.

Land around Trout Road has already been development from employment to residential. It is also noted that a further site has been allocated at Padcroft Works, Tavistock Road for residential development in Yiewsley (Site SA 28). The site is in proximity to the Rainbow Park site but is located fully within the District Centre. It is understood that this site has planning permission for 208 residential units on a site comprising 0.87 ha.

No objection is raised in relation to the allocation of this site, but it is noted that this site retains only 190 sq metres B1 floorspace. Further, that site is located fully within the defined District Centre where it is considered more appropriate to expect a more mixed use development including retail and commercial uses. On this basis, it is considered wholly reasonable and sound in policy terms to allow for a more comparable full residential allocation at the Rainbow Park Site SA29.

The planning application for the Rainbow and Kirby Estates was first developed and discussed with officers at the Council in the context of much less certain policy structure and on this basis the mixed use scheme was put to the Council. With the principle of the loss of employment land established and with an urgent need for housing further consideration should be given to the residential allocation of site SA29 and that this should not be confined solely to the extant planning permission proposals.

At this stage it is considered that the site could accommodate up to 200 dwellings (assuming similar massing/storey heights).

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

As such, we propose that the allocation wording be amended to provide greater flexibility and recognise the suitability of the site for a pure residential development:

“The Council will support the residential redevelopment of the site which will contribute to the regeneration of Yiewsley and the District Centre. The Council may also allow some commercial, leisure or retail uses on the site as part of a mixed use scheme if found to be viable given its sustainable location close to the district centre.

The Council supports the development of this site subject to the following key development principles:

- **Particular consideration will need to be given to the proposed access arrangements to the site;**
- **Proposals should meet the provisions of relevant policies in other parts of the Local Plan;**
- **Development proposals should incorporate canal side improvements to be agreed with the Council.**

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Site SA29 is an allocation site within the Local Plan Part 2. Whilst the allocation is supported (and reflects the recent planning permission for the redevelopment of the site) it is considered that the site could be developed solely for residential development. It is essential that our client has the opportunity to outline this further in the oral part of the examination.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

n/a

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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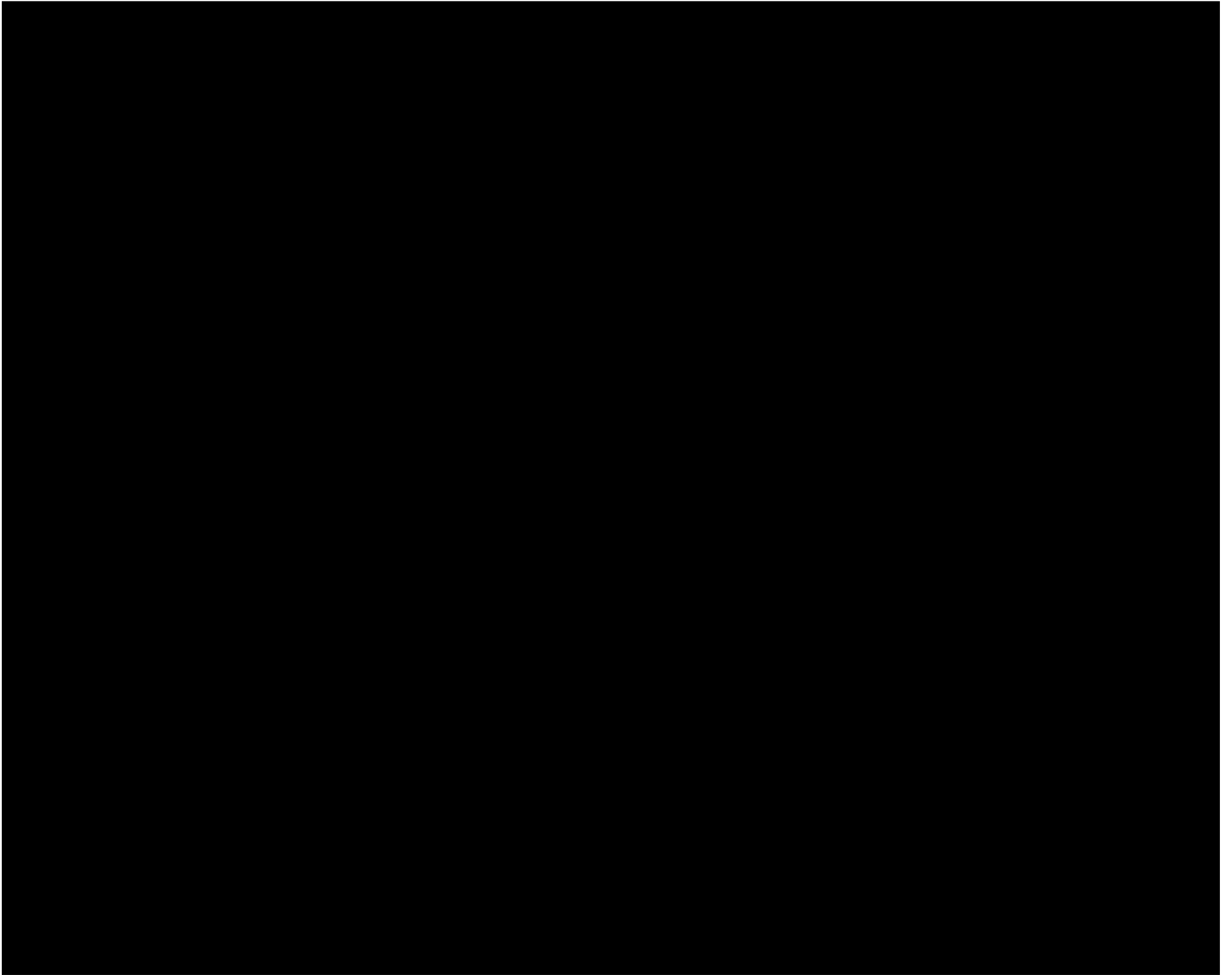
- **Email to:** localplan@hillingdon.gov.uk
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Monitoring Questions

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Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mrs
First name	Sarah
Last name	Brown
Company	Solent Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	17.28

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Representation were submitted to the initial Part 2 consultation in May 2013. A site plan was submitted with that representation showing the full extent of our client's land including additional areas of land fronting St Stephens Road.

Plan 17.28 does not show the full extent of the site which totals 2.31 ha. It is considered appropriate to include the full extent and potential of the site and as such the plan is resubmitted with this representation.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements.

(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

It is requested that the Map 17.28 within the Atlas of Changes be amended in accordance with the submitted red line plan.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Site SA29 detailed on the map and in the Atlas of Change is an allocation site within the Local Plan Part 2. Whilst the allocation is supported (and reflects the recent planning permission for the redevelopment of the site) it is considered that the site could be developed solely for residential development. It is essential that our client has the opportunity to outline this further in the oral part of the examination including the opportunity to discuss the amendments sought to the red line allocation site boundary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

n/a

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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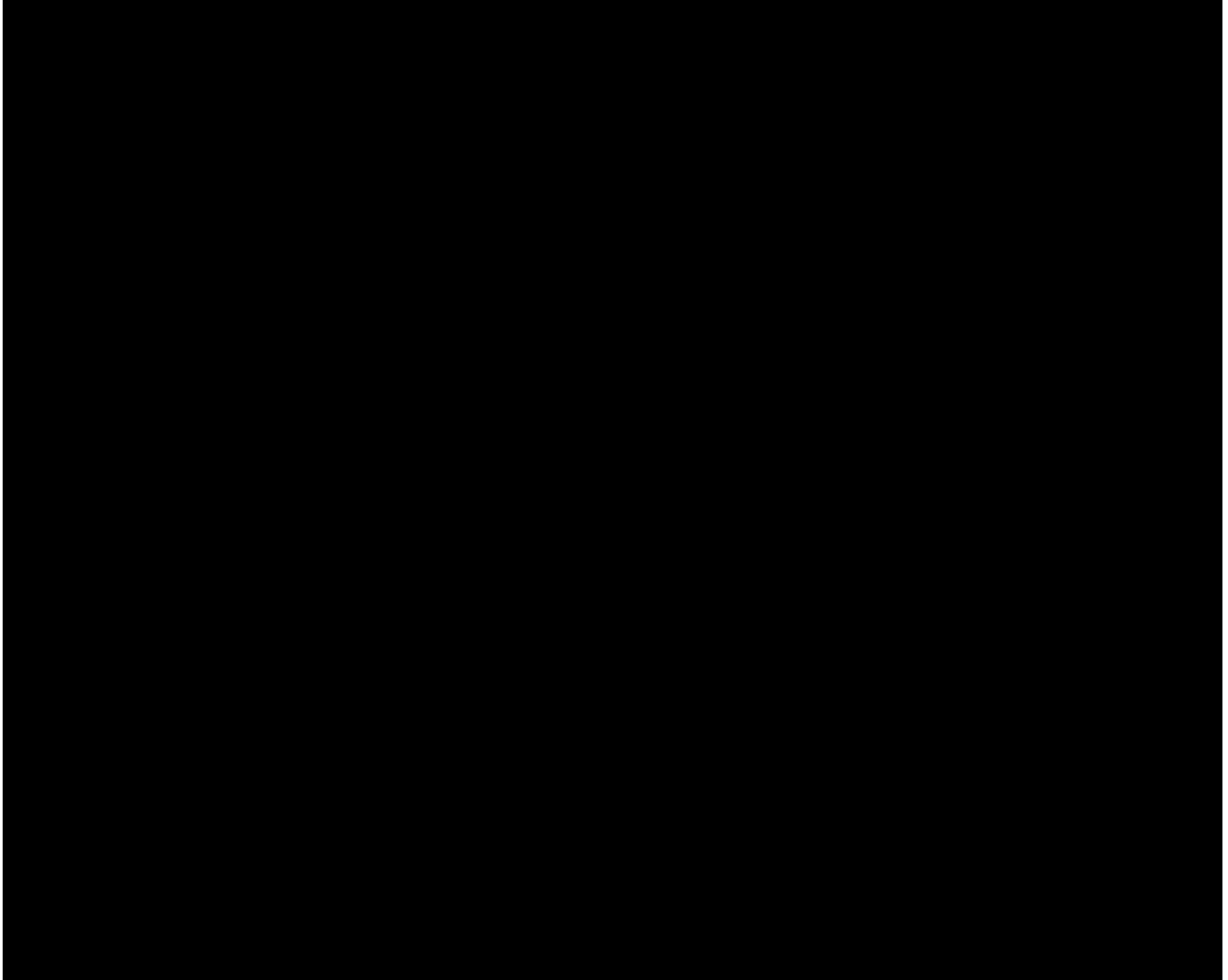
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Proposed Housing Allocation Site - Rainbow and Kirby Industrial Estates and Adjacent Land





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Email			

2. Agent's Name and Address (if applicable)	
Title	Mrs
First name	Sarah
Last name	Brown
Company	Solent Planning
Unit	
House name	
Address 1	
Address 2	
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Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME2
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME2 confirms (in accordance with the conclusions of the updated Employment land Study) that there will be a release of employment land to meet housing requirements. Whilst the Policy confirms that the loss of employment land may be permitted in certain circumstances, it makes no specific reference to the identified and allocated former employment sites which have been identified through the Sites and Allocations document to meet housing requirements.

For robustness, certainty and hence to make the policy sound it is considered essential that the wording of the policy is amended which confirms the principle of the release of employment land on identified sites.

We would also challenge the Note to the Policy that states *“that sufficient evidence should include details of marketing of the site for a period of 2-5 years (depending on location)”*. This is unrealistic and does not take into any consideration the financial liability associated with owning employment sites which are possibly rundown and/or vacant

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

After the text

“Proposals which involve the loss of industrial floorspace or land outside of designated industrial and business areas will normally only be permitted if:”

Add a new bullet point to read

“They are specifically identified within the Site Allocations and Designations Document for the release (in part or full) from employment use for residential and other uses.

Ideally the sites should be listed under this Policy to include Site SA29 Rainbow Industrial Estate, Trout Road.

Note to Policy to be amended to refer to *“... a period of 1-2 years”*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Site SA29 is an allocation site within the Local Plan Part 2 (on which our client has requested to participate in the oral part of the examination). Policy DME2 relating to employment sites is considered relevant to the discussion of the release of this employment site and its residential development potential and as such our client seeks the opportunity to discuss it further in the oral part of the examination.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

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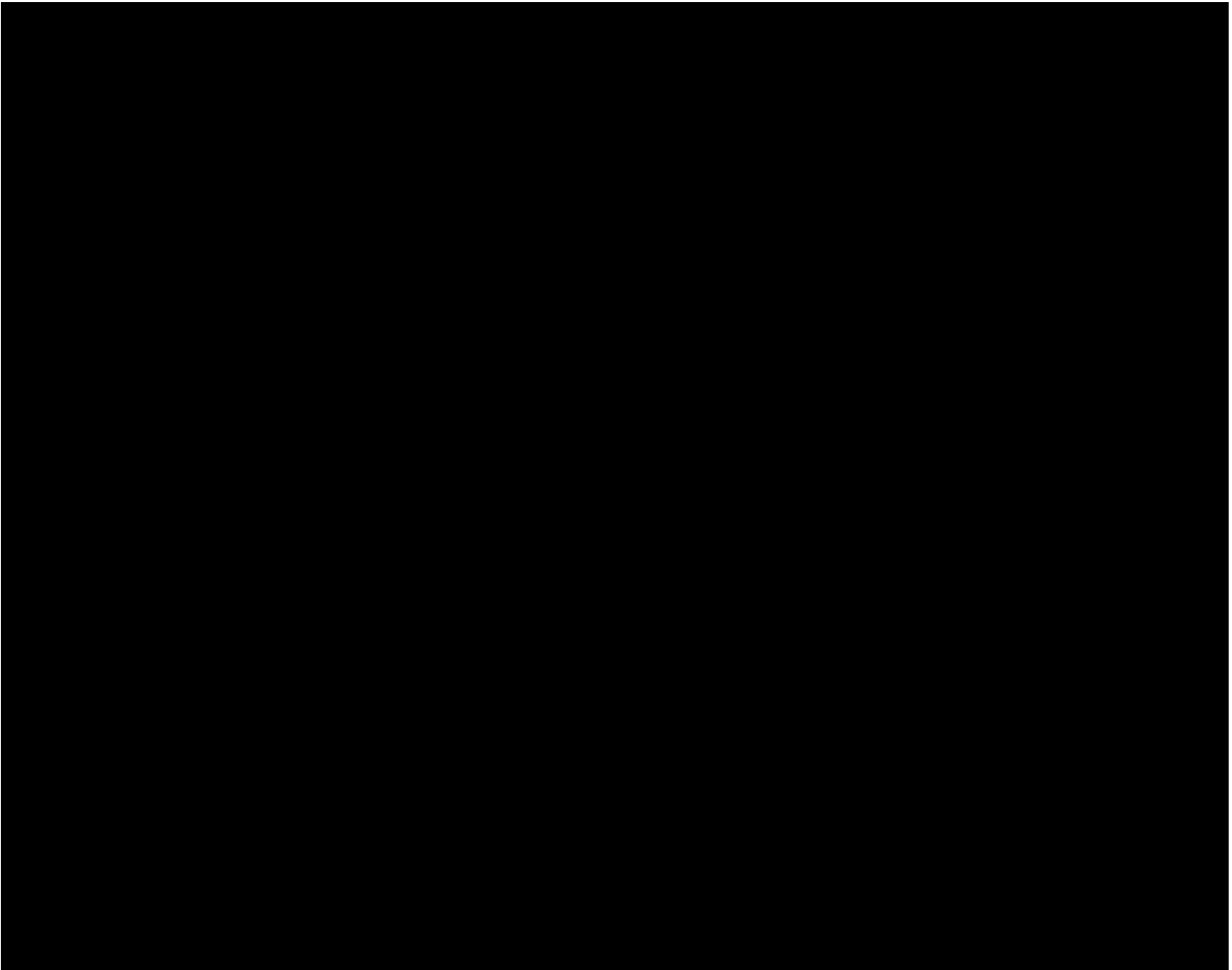
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House name	c/o Agent		
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Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mrs
First name	Sarah
Last name	Brown
Company	Solent Planning
Unit	
House name	
Address 1	
Address 2	
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County	
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMH2
Paragraph Number; or	4.7 to 4.9
Table or Figure Number; or	Tenure Table
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively Prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMH2 relates to the housing mix for new developments.

Paragraph 50 of the NPPF states that to deliver a wide choice of high quality homes local planning authorities should plan for a mix of housing based on current and future demographic trends and reflect local demand.

London Plan Policy 3.8 relates to housing choice and states that Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

The Table associated with Policy DMH2 suggests there will be no 1-bed flats within private housing schemes. It is unclear if this is intended or a drafting error but it is wholly inappropriate to preclude housing sizes within such a housing mix policy and this must be assessed on a site by site basis in the context of the wider proposed housing mix. Further, the level of 2-bed units is considered too low.

The housing mix table is inconsistent with the recognition of the need for a mixture of unit sizes and smaller units detailed in Paragraphs 4.7 to 4.9. Further, the 2013 London Strategic Housing Market Assessment and Hillingdon Local Plan Part 1 do not set any such restriction on smaller units within the housing mix.

The approved scheme for Rainbow and Kirby Industrial Estates (38058/APP/2013/1756) approved in July 2014 includes 25 no. 1-bed units as part of the housing mix.

For this site and other sites in the Borough, the type and form of units will be a balance between the site, its constraints, layout, local context, local demand as well as the identified housing need.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Amend the housing mix table associated with Policy DMH2 to provide for an appropriate level of 1-bed and 2-bed units within the preferred housing mix. A mix of approx 15% 1-bed 15% 2-bed and the remaining 70% 3 and 4 bed would still achieve the Council aim for a balance towards more larger family units.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Site SA29 is an allocation site within the Local Plan Part 2 (on which our client has requested to participate in the oral part of the examination). Policy DMH2 relating to housing mix is considered relevant to the discussion of the residential development potential of site SA29 and as such our client seeks the opportunity to discuss it further in the oral part of the examination.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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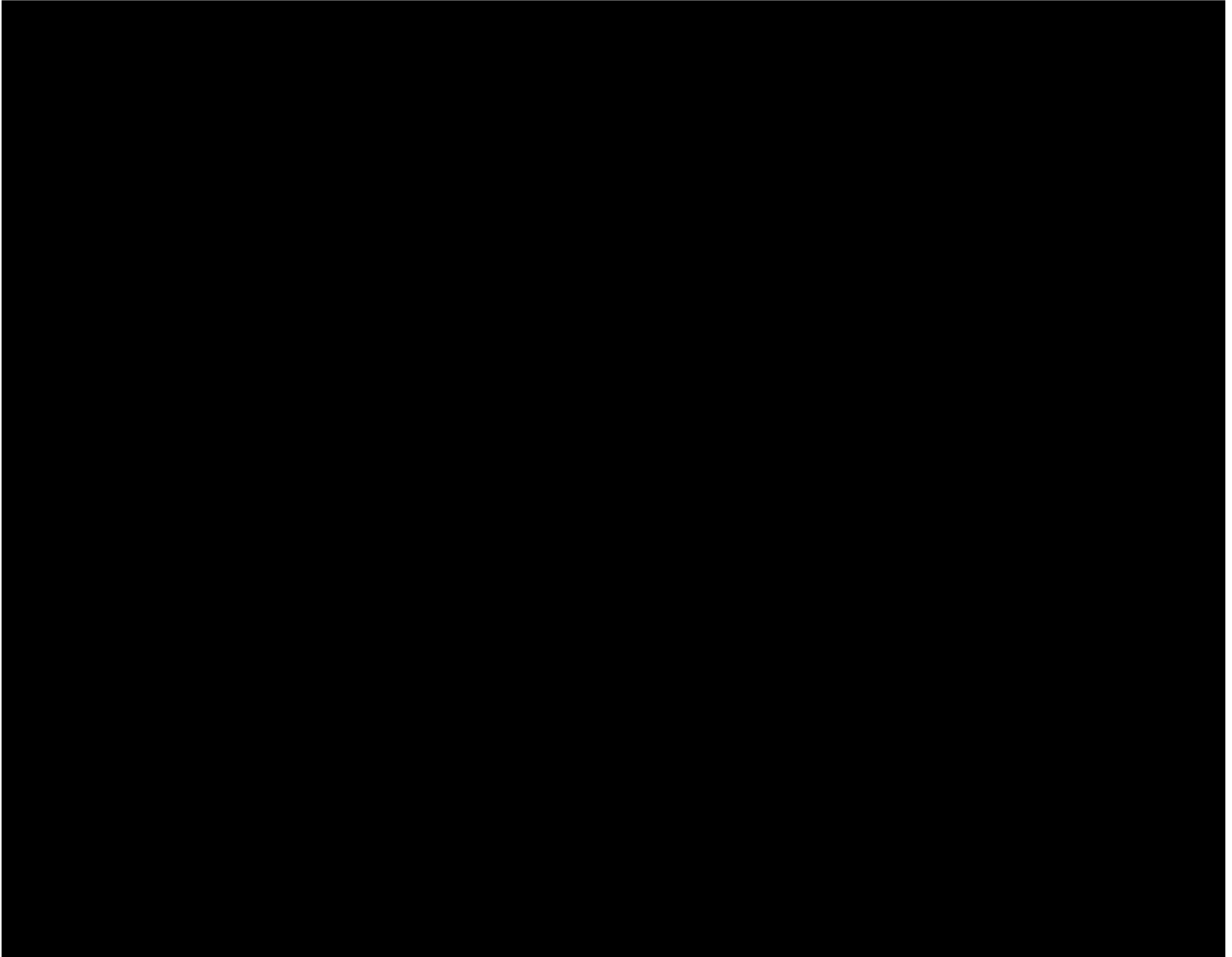
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Last Name	Smith		
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2. Agent's Name and Address (if applicable)	
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First name	Nick
Last name	Taylor
Company	Carter Jonas
Unit	
House name	
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PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy SA10 - Land to the south of the railway, including Nestle Site, Nestle Avenue, Hayes
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Our client welcomes the support provided to the opportunity to comprehensively redevelop the site.

On the basis the redevelopment of 16 hectares of land adjoining an enhanced public transport interchange will create a new neighbourhood or urban quarter, it is considered that the mix of uses and density of development that might be achieved is un-necessarily constrained by the draft proposals for Site A and Site B.

The justification for the provision of new B1 and B2 floorspace within the scheme is not clear and is likely to have a significant impact on the viability of development. This should be excluded.

Also, on the basis of the size of the development site, it has to be recognised that whilst it is necessary for the redevelopment to be planned comprehensively, it should be acknowledged that the site will be built in phases.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

This is an important strategic site for Hayes town and the borough as a whole.

The sites have potential to include a significant number of new homes in the form of apartments and flats and an indicative massing study suggests the site could accommodate up to 1,800 units.

Other land uses that are considered appropriate for the site include hotel, student housing, small scale retail and commercial, education, leisure and community facilities.

The Council will support proposals that meet the following criteria:

Site A

- Higher density development should be located along the canal frontage and take account of lower suburban densities to the south;
- 10% of the site (1.2 hectares) should be used for open space and a sports pitch; and
- Education facilities should be located within this area.

Site B

- Higher density development should be located along the railway frontage and take account of lower suburban densities to the south; and
- Hotel and other town centre commercial and retail uses should be located close to Hayes and Harlington Station; and
- Careful consideration should be given to the connection into Hayes and Harlington Station and the formation of an appropriate entrance to Hayes town centre at the junction of Station Approach and Nestles Avenue; and
- Additional station car parking may be appropriate.

Sites A and B

- Should form a comprehensive development scheme across the whole site; and
- There should be pedestrian / cycle routes through both parts of the site; and
- Development on both sites should meet the requirements of policies in other parts of the Local Plan.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We will engage in the debate about the potential of the site and the need to maximise development of this strategic location.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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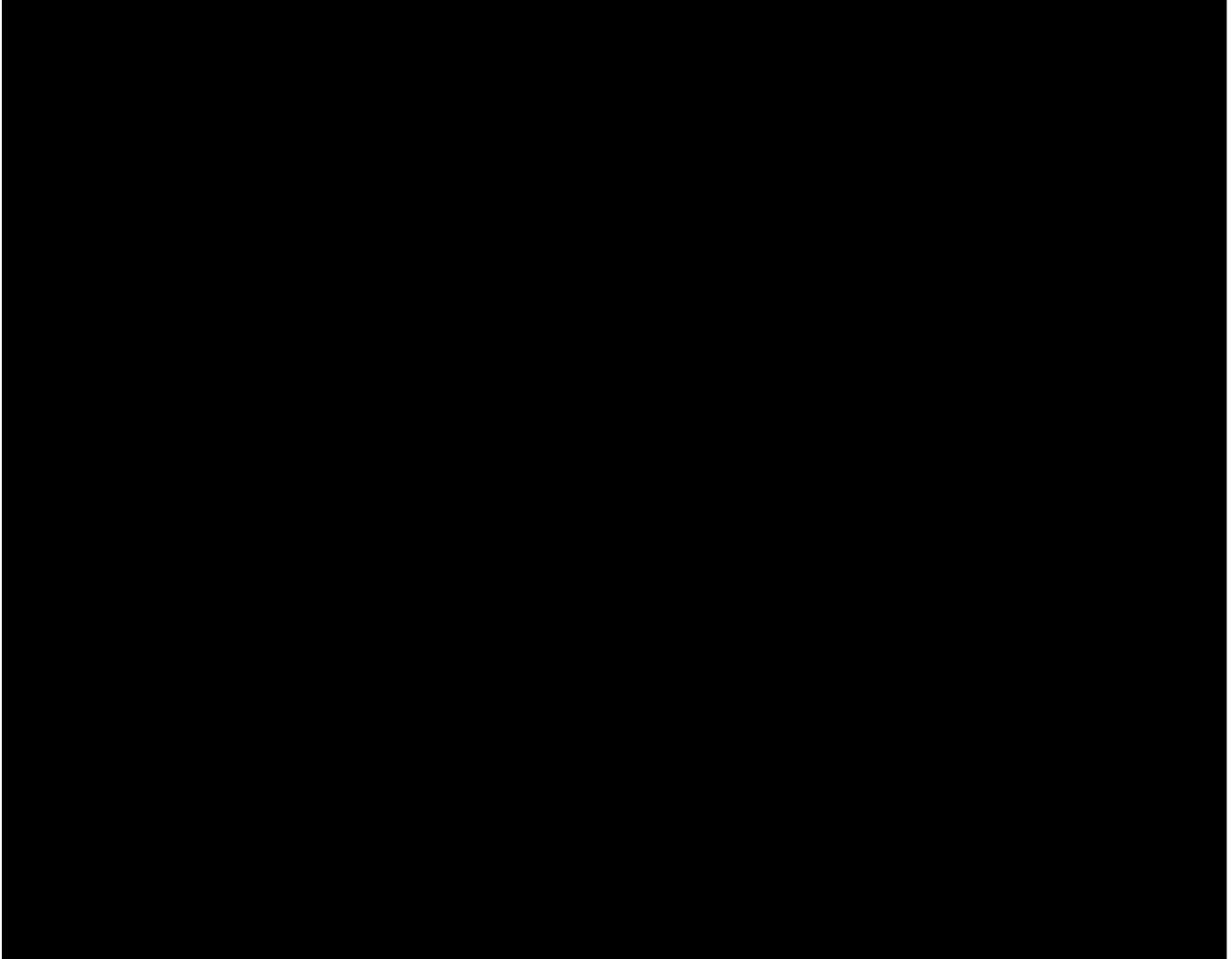
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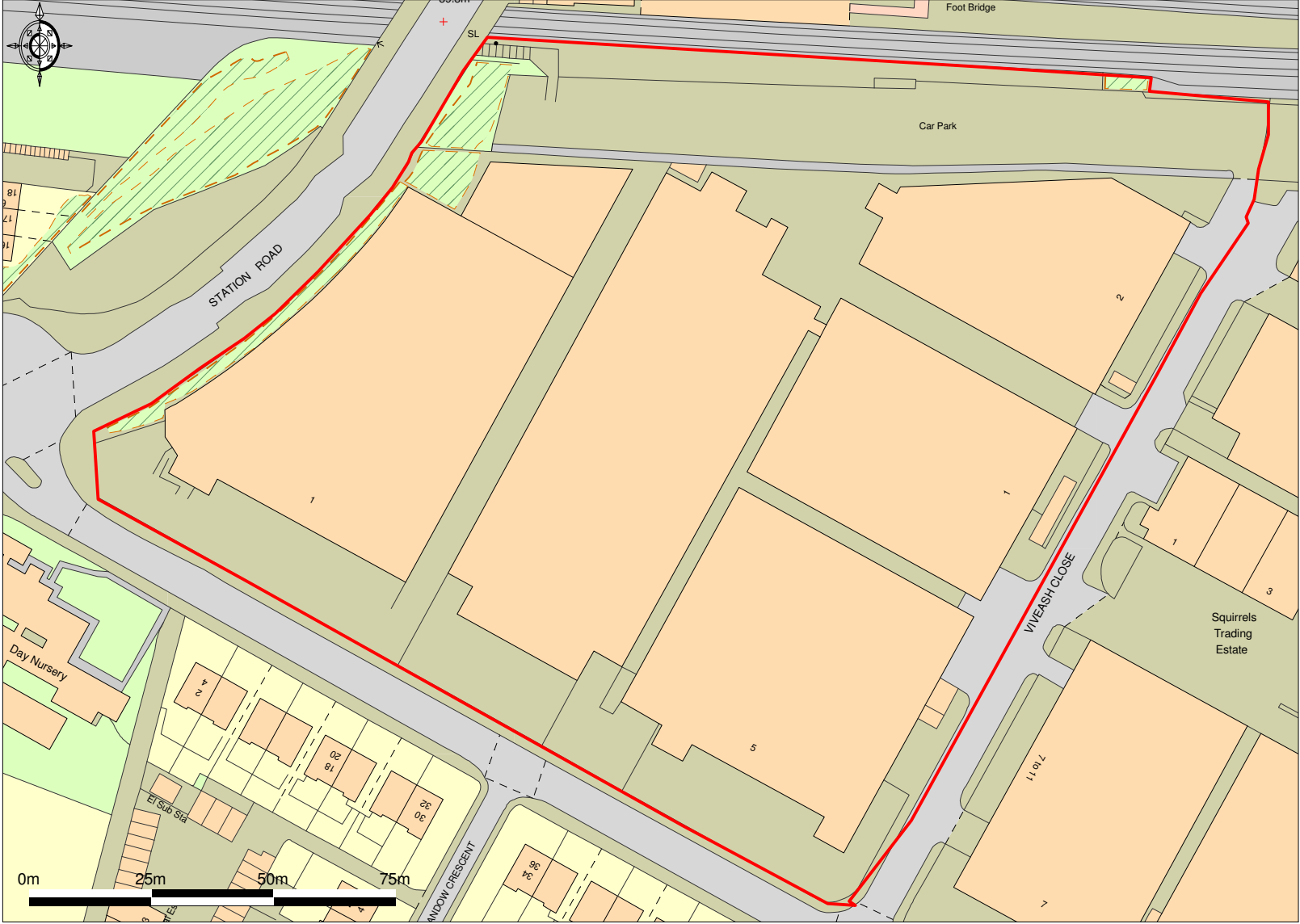
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Land south of Hayes Station





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House name			
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Map 17.9

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

There is an existing car park adjacently north of our client's site and this is owned by Network Rail.

We are currently in discussions with Network Rail about the inclusion of this land within the development area and would suggest that the car park should be included within Site B (see attached plan).

Extending the red line would assist in the comprehensive development of Site B.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please see response to question 5.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To discuss the advantages of including the car park owned by Network Rail within Site B.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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Last name	Taylor		
Company	Carter Jonas		
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House name			
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMH2 - Housing Mix
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The suggested housing mix for the private market, intermediate and social / affordable rented is completely distorted in favour of 3 / 4 bed units. There is no justification for this.

There are two inevitable consequences of this policy that are closely interlinked. First, owing to this lower density of development, a significant porportion of sites will not be viable for housing development. Second, even where development is viable, developing at this low density will lead to a shortfall in the number of units being delivered and the Council will thus fail to meet its housing targets.

The policy is hopelessly flawed.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

A more balanced housing mix across all sectors is set out in the table below. The suggested mix will enable the Council's and London's housing needs to be met across all sectors. The mix set out below is consistent with the approach taken by other London boroughs and is consistent with Policy 3.8 of the London Plan in providing for a range of housing type.

Tenure	1 bed %	2 bed %	3 bed %	4+bed %
Private Market	30	40	25	5
Intermediate Social /	35	40	16	9
Affordable Rented	25	45	25	5

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We will engage in the debate about the borough's housing needs and why the suggested housing mix is appropriate for the borough.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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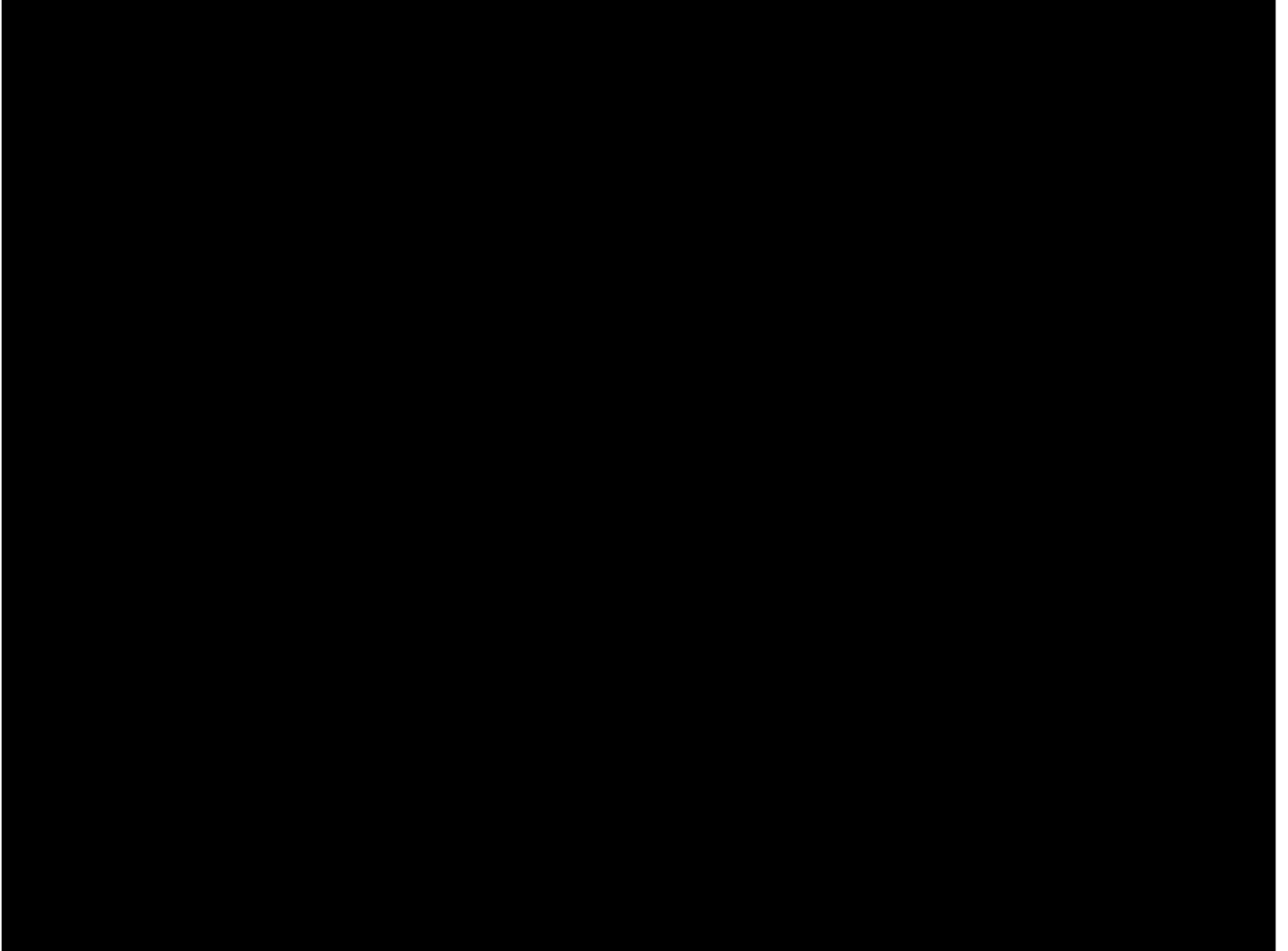
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Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMH7 - Provision of Affordable Housing
Paragraph Number; or	4.25
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
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<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The wording of the Policy at A) ii) is un-necessarily restrictive by requiring a minimum of 35% of all new homes to be affordable, even where viability and other considerations would suggest otherwise. This is unduly onerous and inflexible and is not consistent with the London Plan.

For the same reasons, part D) should be deleted because this repeats A) ii).

Under F), guidance should be provided on what might constitute 'exceptional circumstances' and this overlaps with paragraph 4.25.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Part A) ii) should be revised to read:

The Council will seek 35% of all housing to be provided as affordable housing, subject to viability and site specific circumstances on sites of 10+ more units, with tenure split (70% Social / Affordable Rent and 30% Intermediate) as set out in Policy H2 of the Local Plan Part 1.

As noted, Part D) should be deleted.

Clarification should be provided on the 'exceptional circumstances' in which affordable housing may be commuted off-site.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

By reference to other local authorities in London, we will demonstrate that the Council's suggested approach to affordable housing is unduly restrictive and onerous and why the suggested changes to the policy are appropriate and consistent with the London Plan.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

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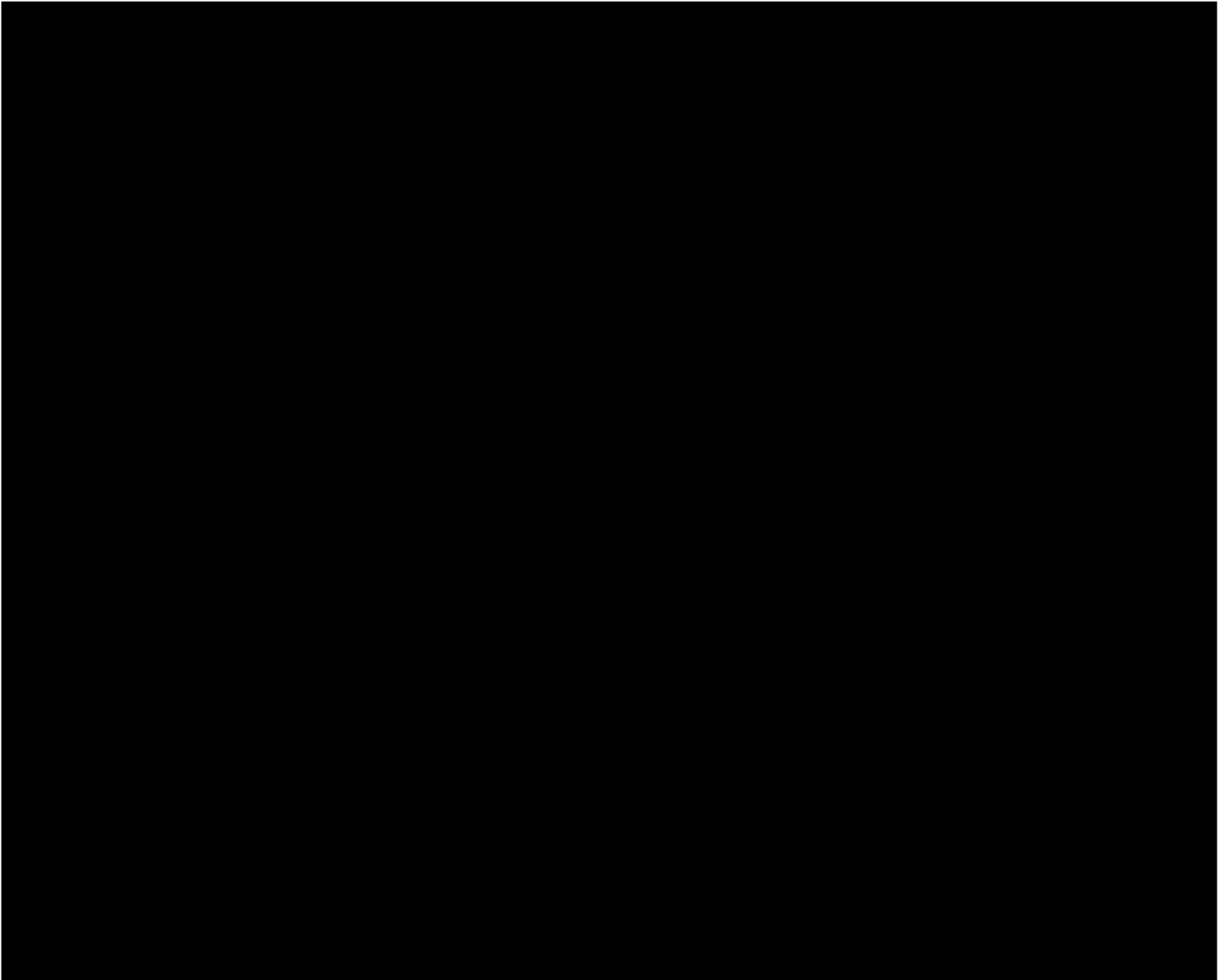
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A large black rectangular area covering the majority of the page, indicating that the content has been redacted.



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PART B - Your responses:

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Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMHB 1 - Heritage Assets
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The draft policy is not consistent with the guidance in the NPPF concerning designated and non-designated heritage assets and it affords non-designated heritage assets the same policy protection as designated heritage assets. Guidance in relation to designated heritage assets is provided at paragraph 133 and this is clearly distinct from the guidance in relation to non-designated heritage assets which is set out in paragraph 135.

The distinction is important because in respect of the former the tests relate to substantial harm or total loss, whereas in respect of the latter the test is in relation to scale of any harm of loss and the significance of the heritage asset. These tests are quite distinct and separate.

The tests included within draft Policy DMHB1 are too onerous and afford the same protection to non-designated heritage assets as heritage assets. This cannot be right.

Policy DMHB5 deals with locally listed buildings which are non-designated heritage assets.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DMHB1 should be revised to refer explicitly to designated heritage assets and should read as follows:

Policy DMHB1: Heritage Assets

A) Development that has an effect on designated heritage assets will only be supported where:

- i) it sustains and enhances the significance of the designated heritage asset and supports viable uses which add to the local character of an area and are appropriate to the conservation value of the asset; and
- ii) it does not result in harm or loss of significance of the designated heritage asset.
- iii) Any extensions or alterations should be designed in sympathy, without detracting from, or competing with, the designated heritage asset. Proposals should relate appropriately in terms of siting, style, scale, massing, height, design and materials.
- iv) New buildings and structures within the curtilage of a designated heritage asset, or in close proximity to it, should not compromise its setting. Opportunities should be taken to preserve or enhance the setting, so that the significance of the asset can be appreciated more readily.

B) Development proposals affecting designated heritage assets need to take account the effects of climate change without impacting negatively on the designated heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We will engage in the debate about the distinction between designated and non-designated heritage assets and explain why the suggested policy change is appropriate for the borough.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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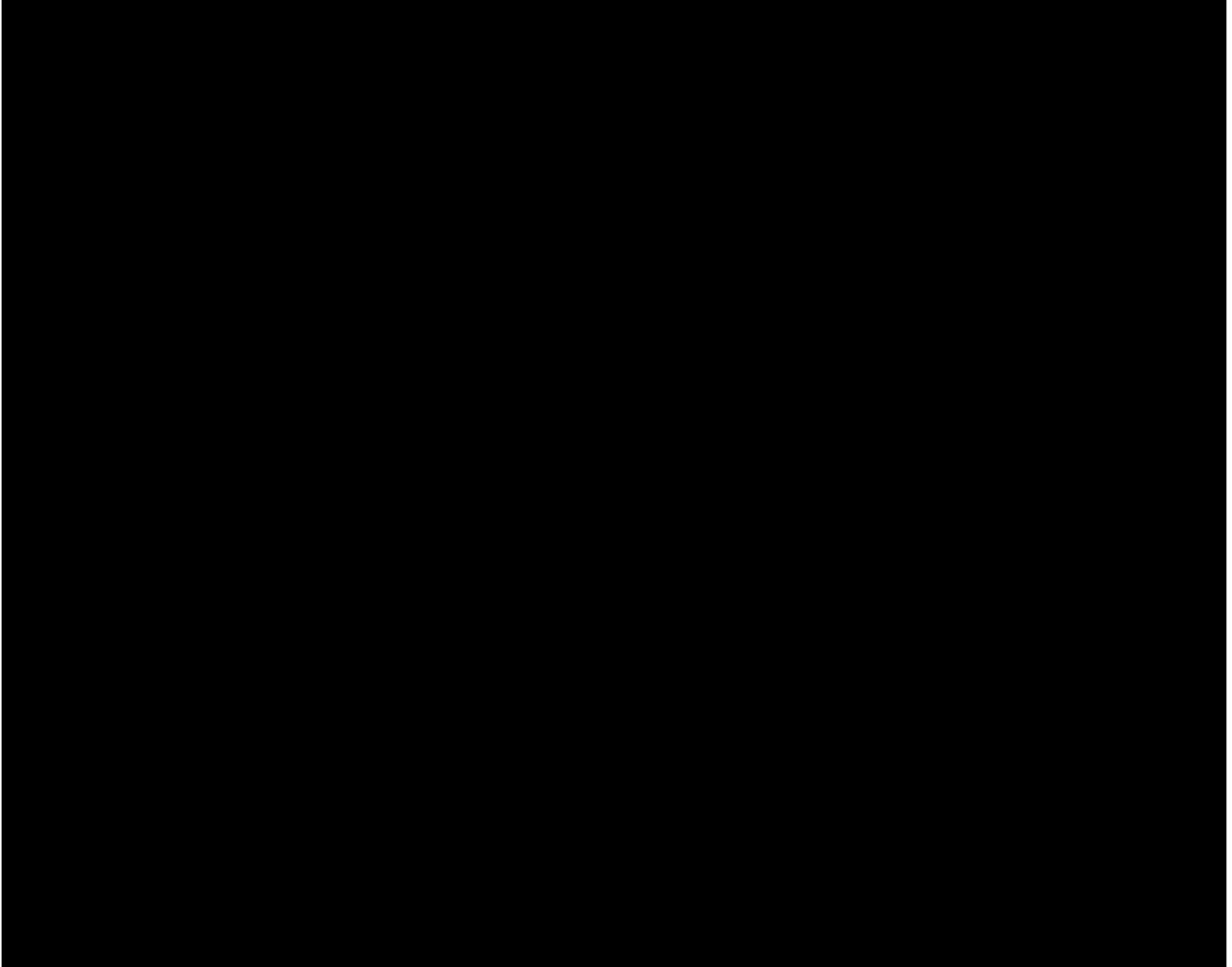
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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	Mr		
First name	Sandy		
Last Name	Smith		
Organisation (if relevant)	Buckleuch Property		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Nick		
Last name	Taylor		
Company	Carter Jonas		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMHB 19 - Private Outdoor Amenity Space
Paragraph Number; or	
Table or Figure Number; or	Table 2
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The amount of private outdoor amenity space required for all housing units, irrespective of size, exceeds the guidance set out in the London Plan Housing SPG, November 2012. Standard 4.10.1 of the SPG states that a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant. This is an appropriate amount of space per dwelling that increases to reflect the number of occupants and it is substantially lower than the standard suggested in Table 2.

The standards set in Table 2 are far too onerous and inflexible and would impact on a site's development potential and viability. There is no justification for a standard that is between 6 and 10 times the standard required by the London Plan.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Table 2 should be revised to reflect the number of occupants and hence a range should apply:

Houses	1 bedroom (1p / 2p)	5 - 6sqm
	2 / 3 bedrooms (3p / 5p)	7 - 9sqm
	4+ bedrooms (5p / 6p)	9 - 10sqm
Flats	Studio and 1 bedroom (1p/ 2p)	5 - 6sqm
	2 bedrooms (3p / 4p)	7 - 8sqm
	3+ bedrooms (4p / 6p)	8 - 10sqm

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

By reference to the London Plan, we will demonstrate that the Council's suggested approach to private outdoor amenity space is unduly restrictive and onerous and why the suggested changes to the policy are appropriate.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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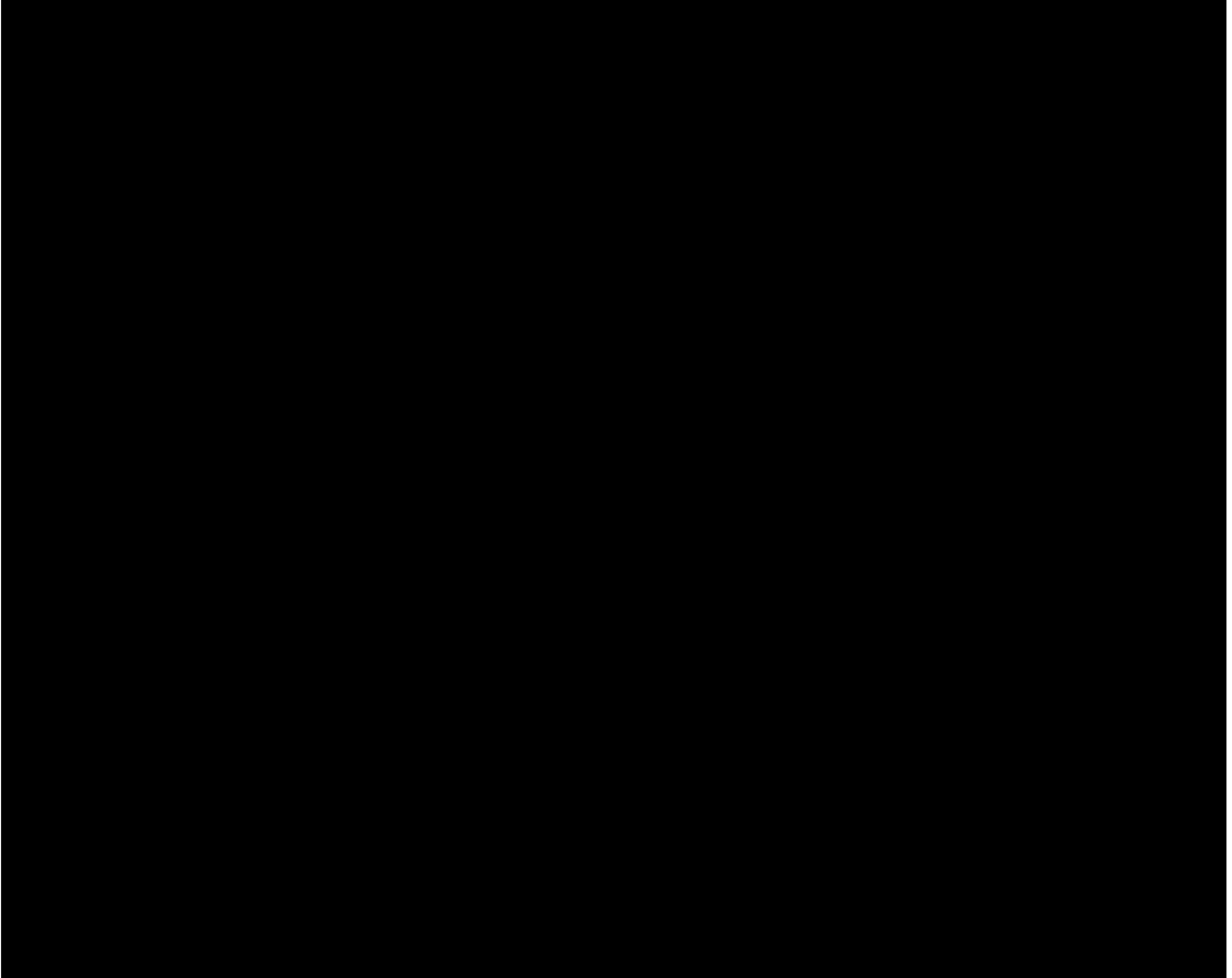
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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	Mr		
First name	Sandy		
Last Name	Smith		
Organisation (if relevant)	Buckleuch Property		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Nick		
Last name	Taylor		
Company	Carter Jonas		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMHB20 - Residential Density
Paragraph Number; or	
Table or Figure Number; or	Table 3
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The standards set out in Table 3 are not in accordance with Table 3.2 - Sustainable Design Quality (SRQ) density matrix (habitable room and dwellings per hectare) of the London Plan.

Sites within a central location as defined in the London Plan as (very dense development, a mix of development uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an international, metropolitan or major town centre), should be at the following densities:

3.8 - 4.6 hr / unit: 140 - 190 u/ha

3.1 - 3.7 hr / unit: 175 - 355 u/ha

2.7 - 3.0 hr / unit: 215 - 405 u/ha

There are several consequences of using the densities as detailed in Table 3: Residential Density Matrix that are closely interlinked. First, owing to building at a lower density, a significant porportion of sites will not be viable for housing development. Second, even where development is viable, developing at this low density (and not maximising the potential of a site) will lead to a shortfall in the number of units being delivered and the Council will thus fail to meet its housing targets.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Sites within a central location as defined in the London Plan as (very dense development, a mix of development uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an international, metropolitan or major town centre), should be at the following densities:

3.8 - 4.6 hr / unit: 140 - 190 u/ha

3.1 - 3.7 hr / unit: 175 - 355 u/ha

2.7 - 3.0 hr / unit: 215 - 405 u/ha

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We will engage in the debate about the borough's housing densities and explain why the suggested densities in accordance with the London Plan are appropriate.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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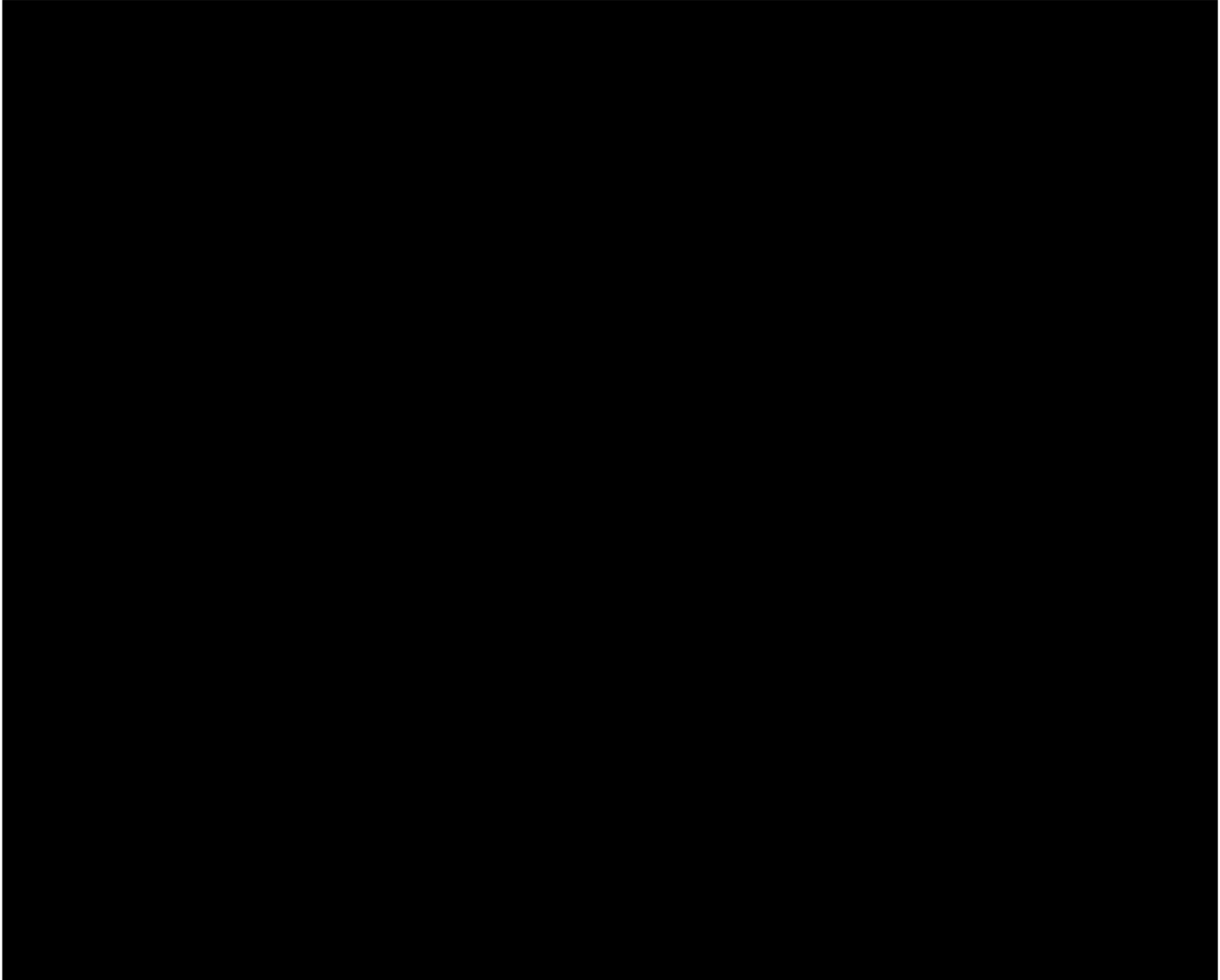
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Access Self-Storage		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Jon		
Last name	Dingle		
Company	Jon Dingle Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy SA10 - Land to the south of the railway, including Nestle Site, Nestle Avenue, Hayes
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The identification of this area as being appropriate for comprehensive redevelopment is welcome.

The current draft proposals for Sites A and B are inappropriately restrictive in terms of the uses identified and the percentages of the area for various uses.

The justification for high density development only along the canal is unduly restrictive. High density may be appropriate in other locations, such as the road frontages.

Whilst there should be a degree of comprehensive planning for an area this large, the allocation should acknowledge the individual sites could come forwards for development within a wider framework.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

This is an important strategic site for Hayes town and the borough as a whole. The Council will support proposals that meet the following criteria:

Site A

Residential uses are appropriate and higher density development should be located where appropriate.

Uses to support residential uses will be considered suitable, including small scale commercial uses, open space and a sports pitch, and education facilities

Site B

No comment on this aspect of the policy.

Sites A and B

Should form a comprehensive development scheme across the whole site; and
There should be pedestrian / cycle routes through both parts of the site; and
Individual sites may come forwards for development but should be consistent with a comprehensive approach

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We wish to engage in the debate about the potential of the site and the need to maximise the

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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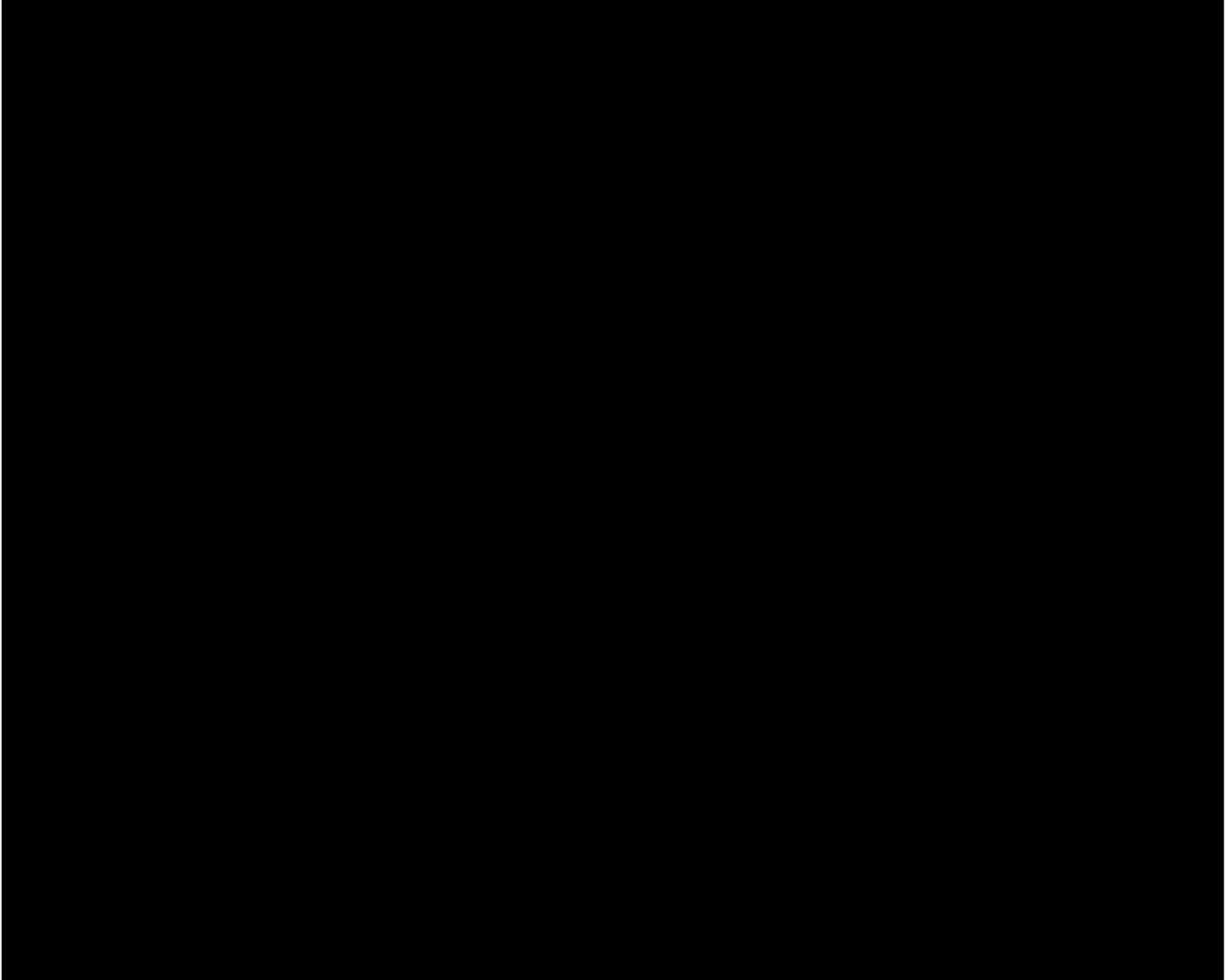
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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Access Self-Storage		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Jon		
Last name	Dingle		
Company	Jon Dingle Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DMH2 - Housing Mix
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The preference for 3 / 4 bed units for all types of housing tenure is not justified.

The low densities arising from such development would lead to significant difficulties in terms of maximising the development potential of sites, the viability of developing such sites, and, as a consequence, making it very difficult for the Council to meet its housing targets.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

A more balanced mix, reflecting the high demand for all sizes of units across all tenure types would be more appropriate.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We wish to participate in the discussion about the Borough's housing needs.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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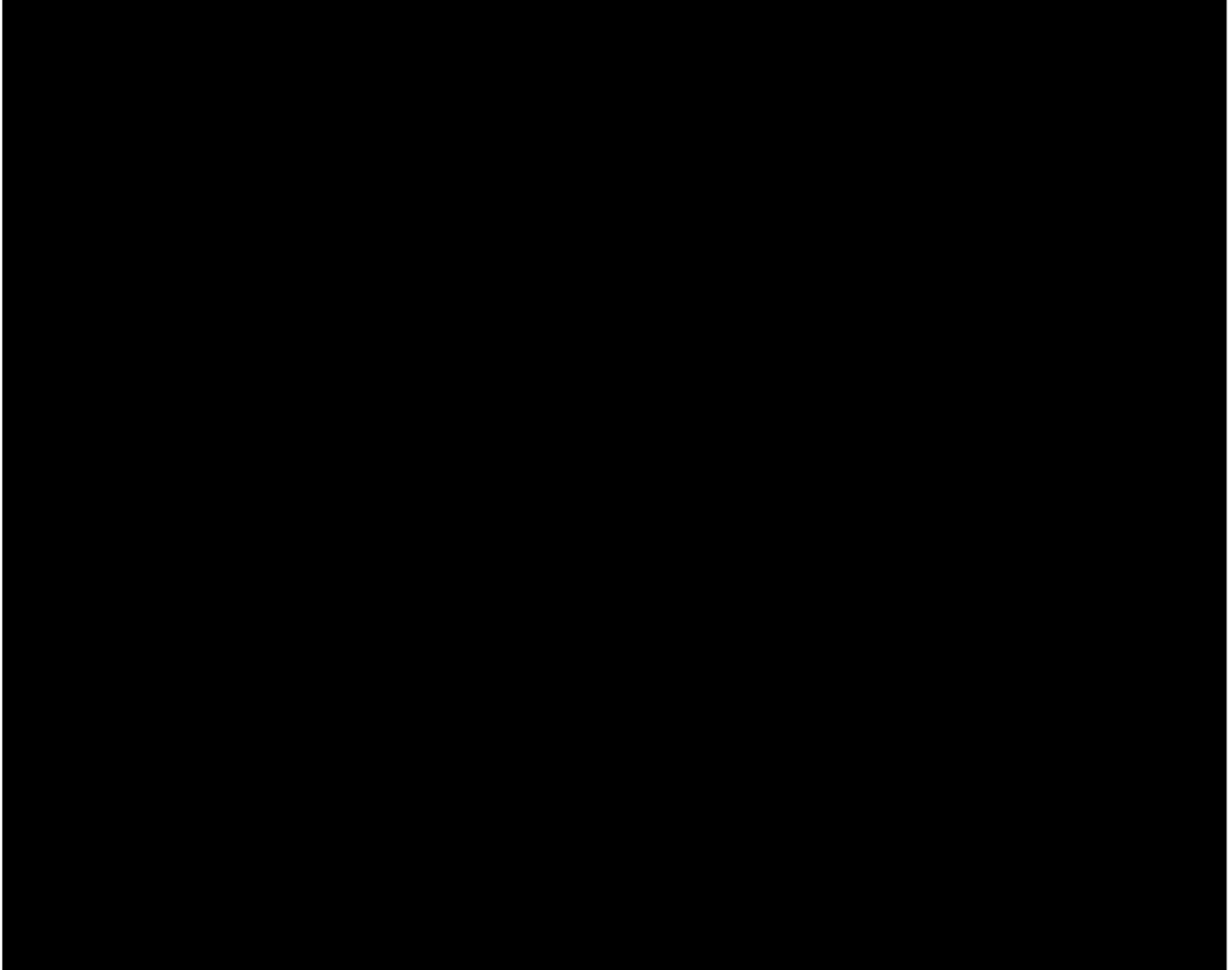
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First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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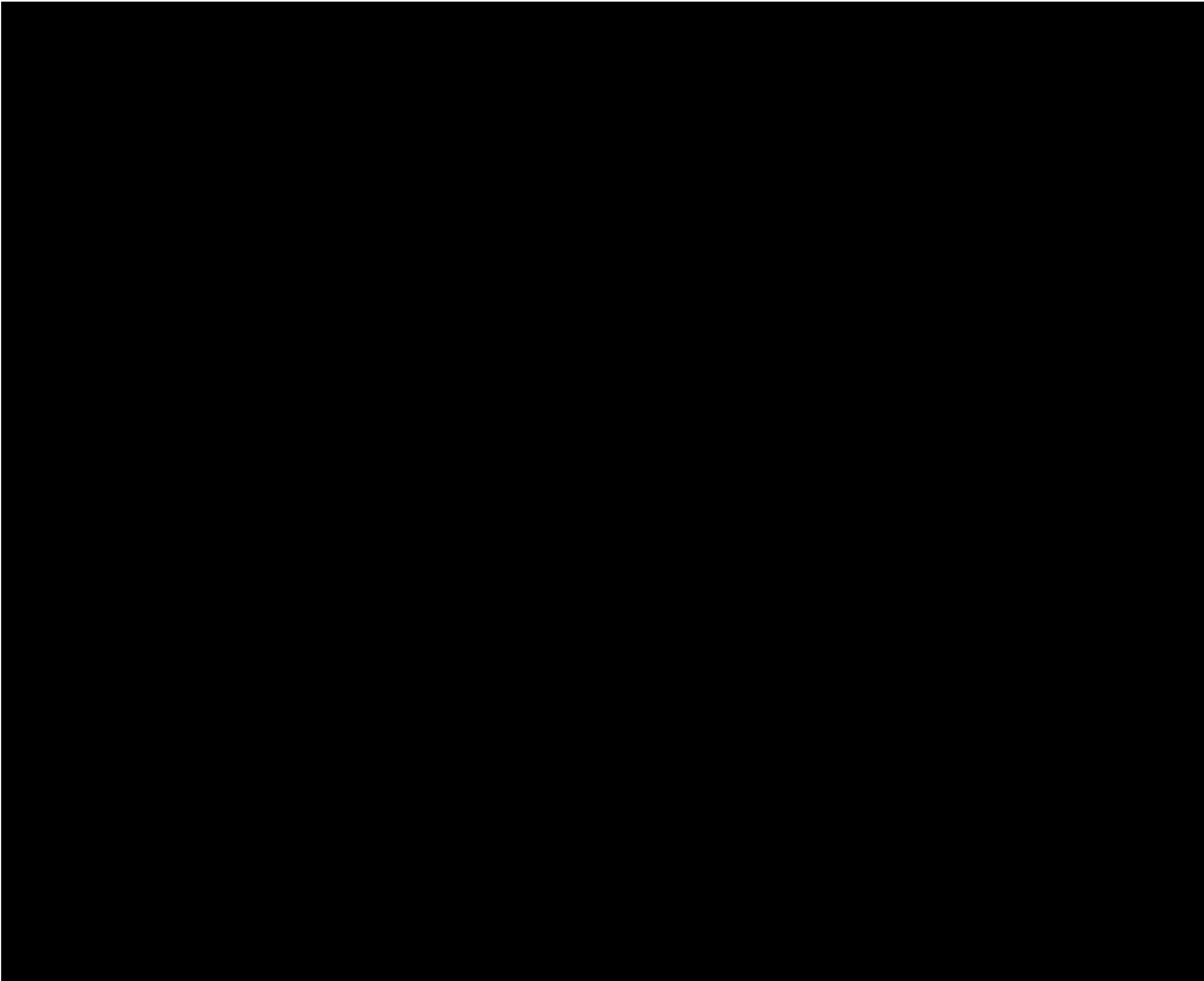
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

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Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Empty response box for comments.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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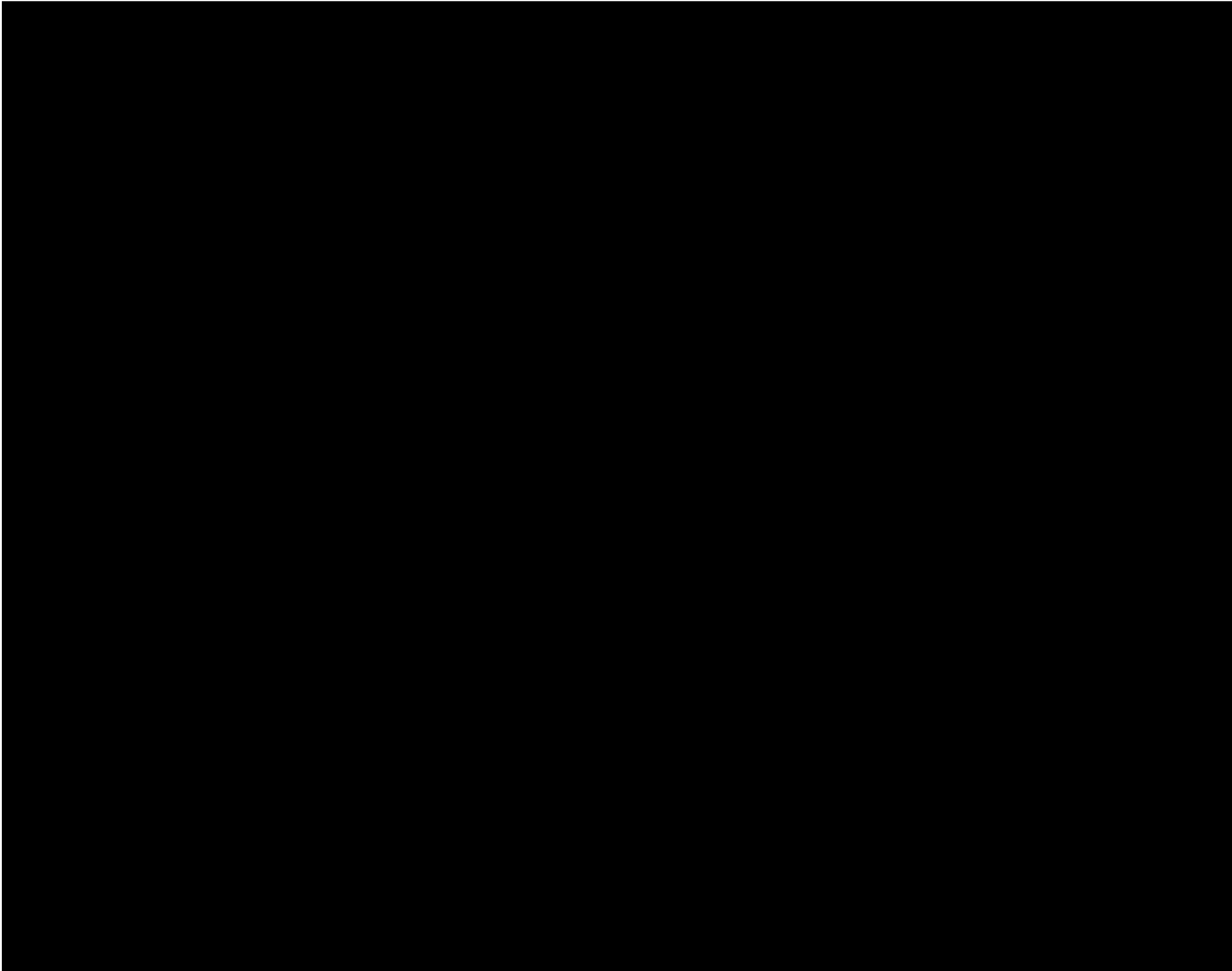
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

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Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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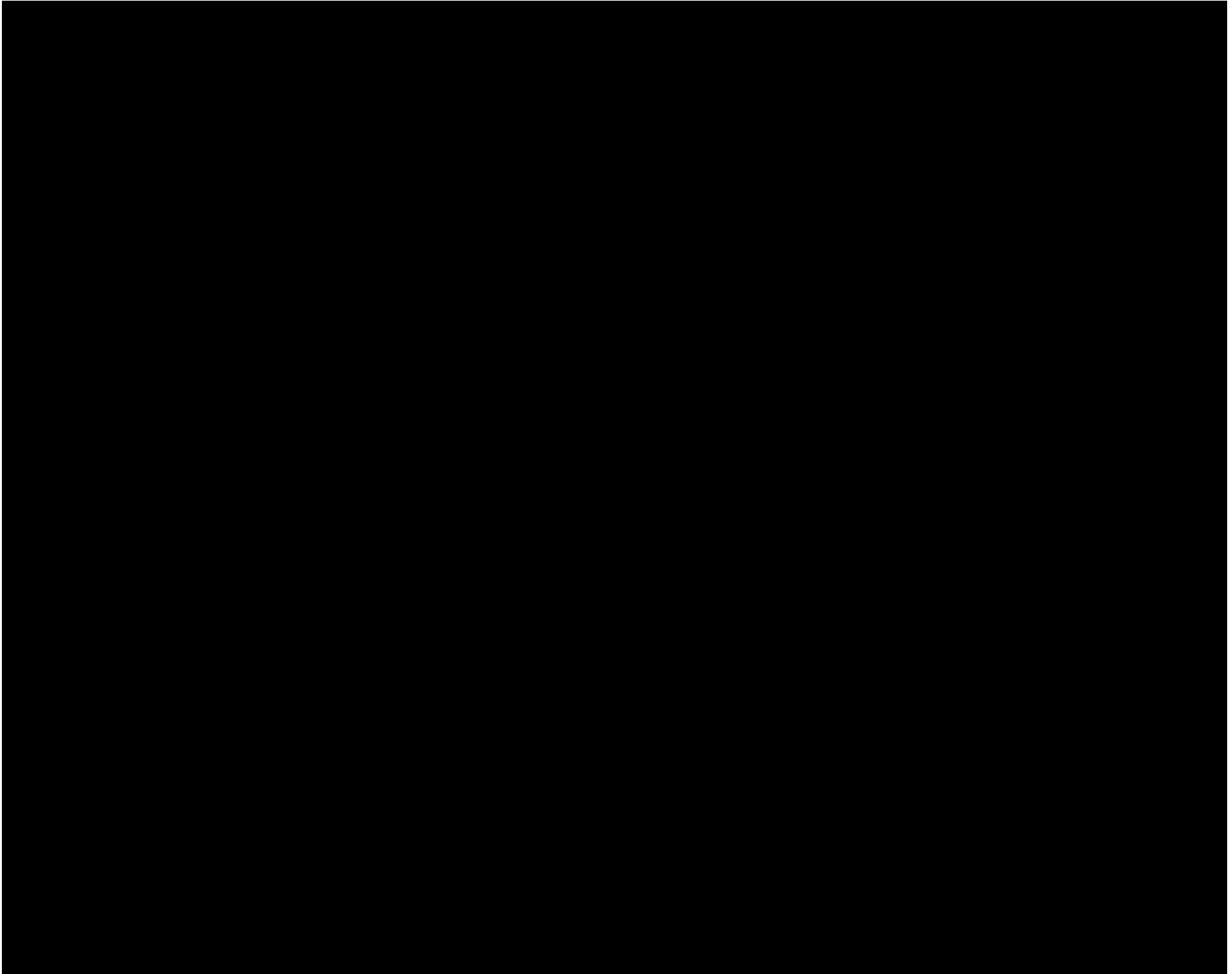
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Q1. I am commenting on:
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Local Plan Part 2	
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<input type="checkbox"/>	Policies Map (Atlas of Changes)

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Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

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Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Empty response box for providing answers to Q6.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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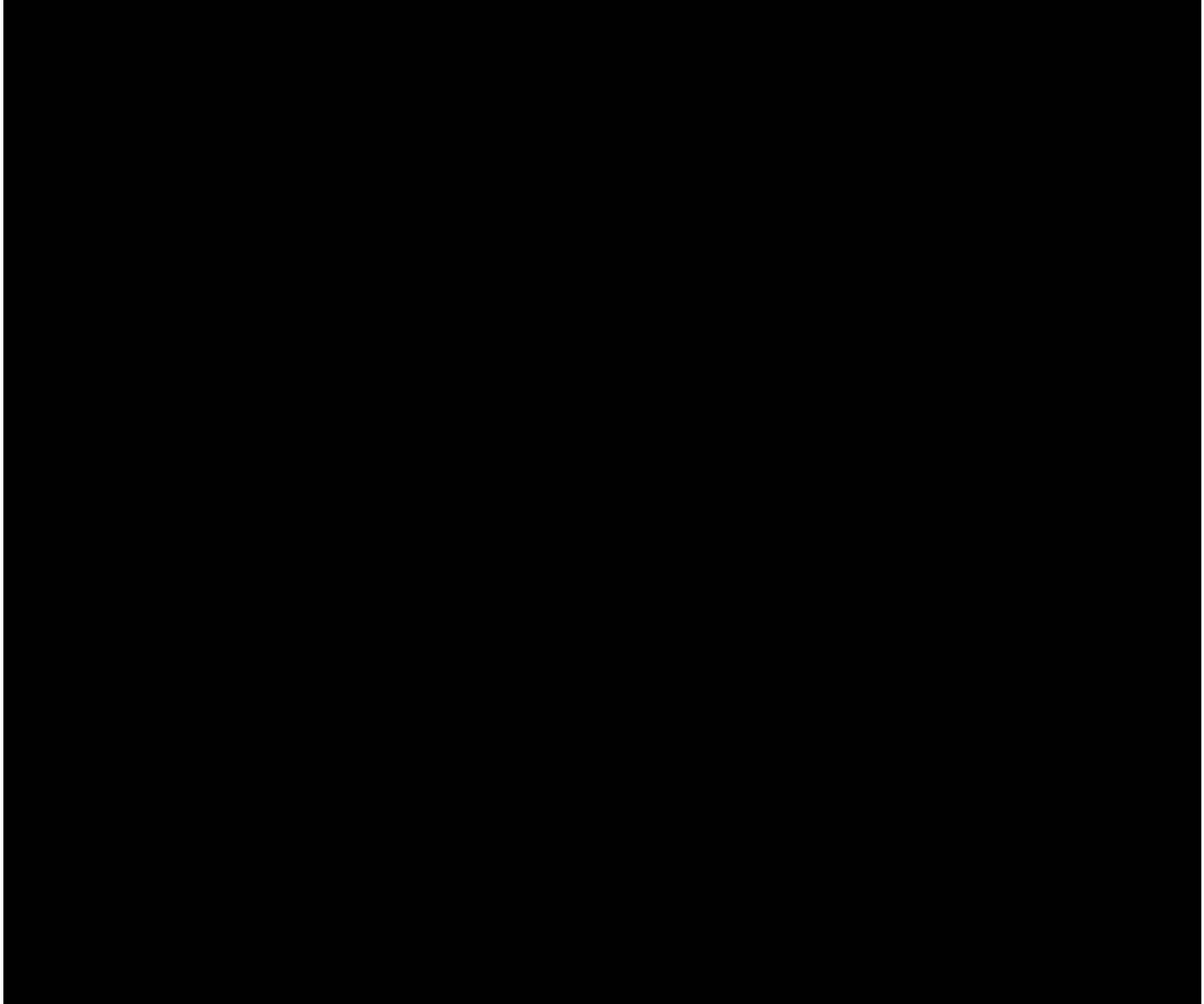
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MRPG/DP3599

Planning Policy Team,
London Borough of Hillingdon,
3N/02 Civic Centre,
High Street,
Uxbridge,
UB8 1UW



4th November 2014

Dear Sirs,

LOCAL PLAN PART 2: PROPOSED SUBMISSION VERSION
Representations on behalf of royal Brompton and Harefield NHS Trust

Please find enclosed representations submitted on behalf of the Royal Brompton and Harefield NHS Trust (the Trust) in respect of the draft Local Plan, Proposed Submission Version.

The Trust welcomes the opportunity to participate and comment in respect of the future plan-making process. The Trust has considerable interest in relation to the production of a Local Plan that will guide development in the borough for the years to come.

In particular the Trust looks forward to continuing the positive dialogue that currently exists with the council officers and members regarding Harefield Hospital and its environs. The Hospital has been located at Harefield since before the 1930's and has developed over time to become not only a nationally but internationally renowned facility. It is important therefore that the Trust has consideration to the proposed development of the Local Plan and any policies and guidance that might impact on the continued functioning of the Hospital.

Harefield Hospital is a specialist hospital that carries out cardiac surgery, thoracic surgery, heart and lung transplantation, and treats and prevents heart attacks and irregular heart rhythms. As a tertiary centre, treatments are carried out on patients referred from other hospitals in a catchment area of 4-5 million people living in the outer boroughs of north-west London and across the north-west home counties (East Berkshire, Buckinghamshire, Hertfordshire and Bedfordshire). These are patients whose conditions are complex to diagnose and to manage, or whose treatments call for interventions by highly specialised and experienced clinicians based in operating theatres, catheter labs and in critical care units – in other words, resources and teams that are co-located in only 5-7 centres across the whole of London and the south-east of England.

This status as a centre of excellence has led to significant growth in demand from referring hospitals over the past 10 years across all service lines. Harefield is an acute cardiac centre with (for example) one of the busiest heart attack treatment services and the largest cardiothoracic transplantation programme in the UK.

The Hospital is located within the Metropolitan Green Belt. It is an established institutional building in the Green Belt which through close careful and detailed consideration with the Council over time has managed to continue to develop its functions to cater for the increased and changing context of its specialist health care role.

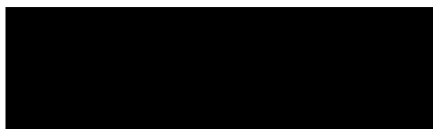


The Trust previously had an interest in the land to the immediate north west of the Hospital which was identified in the 1998 UDP with potential for development of a Medipark facility. Whilst this is now not being pursued and others have ownership interest in the land, the Trust considers that the site of the previously proposed Medipark offers the opportunity for development in the Green Belt that has synergy with the Hospital functions.

The Trust has reviewed the draft Local Plan Part 2 having regard to this context and has made comments in respect of some of the emerging draft policies. The details of these representations are attached. The Trust reserves the right to amend these representations as appropriate.

Should you wish to discuss the nature of the comments please contact Matthew Gibbs at this office.

Yours faithfully



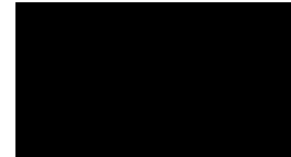
DP9 Ltd



Our ref: 02B450664

3rd November 2014

Planning Policy Team
3N/02
Residents Services
Civic Centre
High Street
Uxbridge
UB8 1UW



gva.co.uk



Dear Sir or Madam

Proposed Submission Local Plan Part 2 – Site Allocations and Designations Consultation

We write on behalf of our client, Transport for London (TfL) regarding the consultation being undertaken by the LB Hillingdon in preparation of the Local Plan Part 2.

This representation relates to TfL owned land which comprises Land at Green Lane / Station Approach, Northwood as defined by the enclosed site plan. The site will be known to the Council; previously TfL, alongside its Joint Venture (JV) partner, sought to bring forward a mixed use supermarket-led scheme however due to strong local opposition, mainly as a result of the supermarket element, the scheme never progressed to a planning application, and subsequently JV partnership ceased.

Following this, TfL is undertaking a comprehensive engagement exercise with the local community to ascertain the opportunities, concerns and aspirations for the site alongside its contribution to Northwood town centre. TfL appointed community engagement consultants Make:Good who have been interacting with the local community through a series of workshops/drop-ins sessions. In addition, a dedicated website (<http://northwoodfutures.com/>) has been created to provide individuals access to information and comment on the process. Overall, this has been a considered engagement process with weekly sessions taking place since July 2014, fortnightly reports uploaded onto the website, a number of workshops which took place during week commencing 20th October 2014, and a number of public meetings. Overall, Make:Good has met with 1,504 people and received 776 pieces of individual feedback. TfL has also appointed a multi-disciplinary Consultant Team to review and assess the site constraints, in light of the feedback received to date. TfL intends to report the outcome of the consultation process to the local community on the 4th November 2014 which is also the closing date for the current consultation on the draft Local Plan Part 2.

The current consultation follows the regulation 18 consultation undertaken in April and May 2013 which comprised a consultation paper and 'Call for Sites' exercise. A submission was made to the exercise proposing the redevelopment of the site for a 47,000 sq. ft. supermarket and 160 residential units. The proposed allocation was not taken forward following Officer's views that it could have major implications on Northwood Town centre.

The NPPF notes Local Plans should be positively prepared, contribute to sustainable development and based on co-operation with public and private sector organisations (para 157). Appreciating the significant amount of feedback received to date supporting some form of development on the site, and the communities' view that this is one of the largest sites to come forward in Northwood for some time, we propose the site is reconsidered and taken forward as a mixed use allocation within the Site Allocations DPD. We recognise the Borough's current consultation is intended to focus on proposed sites set out in the document. However, the Local Plan process allows Local Planning Authorities the flexibility to make further amendments to the Proposed Submission Version of the Plan in advance of submission to the Secretary of State. Therefore, we

consider there remains ample opportunity to introduce the site to the draft Site Allocations DPD, and request that the Council consider this representation favourably.

We consider it would be premature to provide a detailed response prior to the 4th November as this would not afford my Client, the time required to properly consider the significant amount of feedback received from Northwood to date. We intend to submit a further representation regarding the site's allocation within 2 weeks of the close of this consultation, although this will be after the published deadline, we trust that our further representation will be considered given the significant amount of work undertaken.

As a key stakeholder, landowner and transport provider across the LB Hillingdon, TfL is keen to work closely with the LPA and local community to bring forward a positive mixed-use development of its site in Northwood. The Site Allocations DPD provides the opportunity to recognise the potential the site can play in delivering a scheme which provides positive growth and sustainable development, the underlying principles of the NPPF.

We look forward to meeting with you to discuss our proposed representation and feedback from our Northwood Futures engagement process in the weeks following the 4th November 2014.

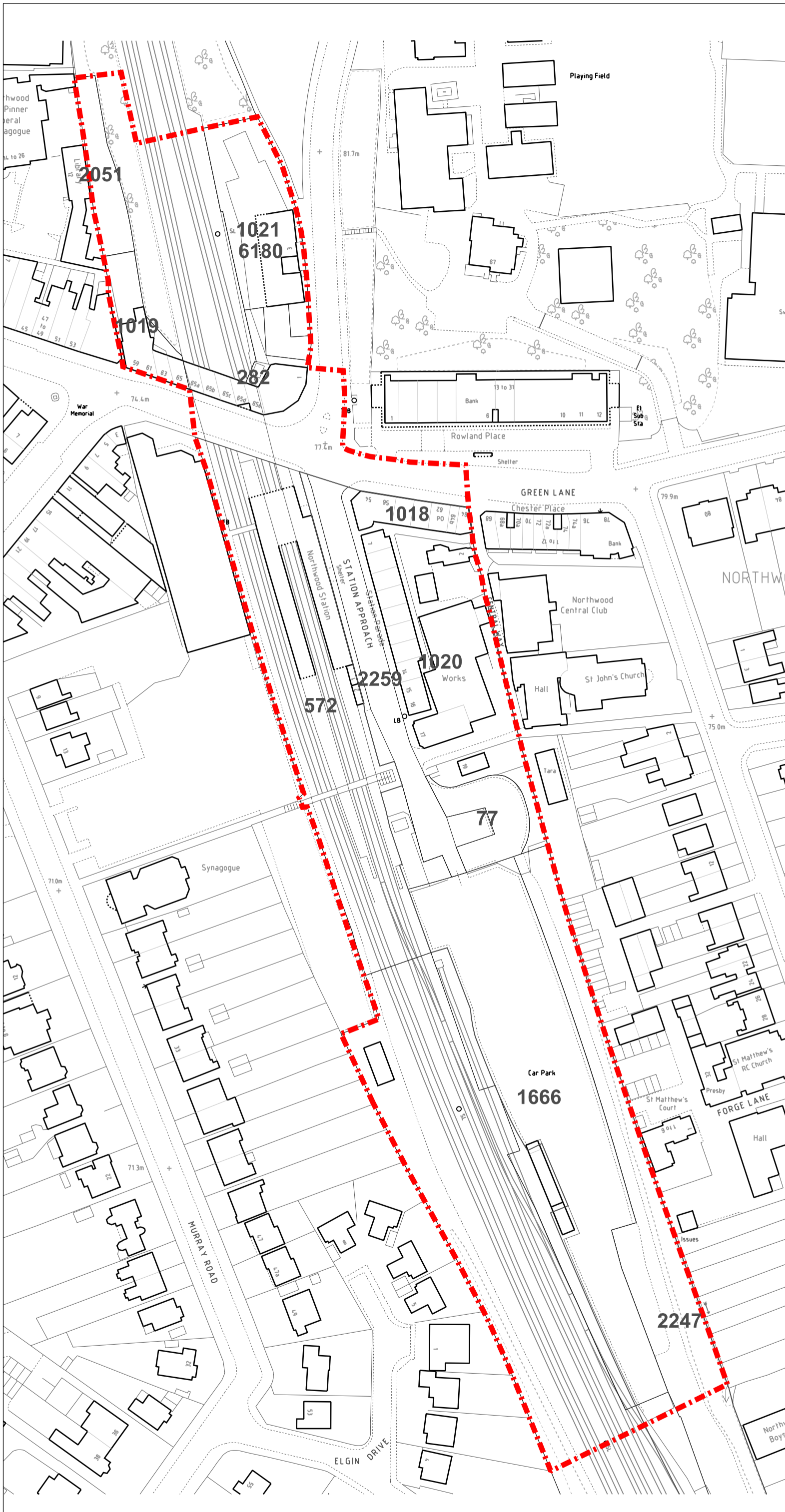
Yours sincerely



Tim Sturgess
Senior Planner

For and on behalf of GVA Grimley Ltd

Enclosure: Site Location Plan



Project Logo

Notes
 Do not scale from this drawing.
 All dimensions are to be checked on site and any discrepancies noted in writing to the Project Manager.
 All dimensions are in millimeters unless noted otherwise.

Rev.	Date	Description	Drawn	Checked

JOHN MCASLAN + PARTNERS
 7-9 William Road
 London NW1 3ER
 T +44 (0)20 7313 6000
 F +44 (0)20 7313 6001
 www.mcaslan.co.uk

Architect
 Landscape

Green Lane TFL Sites
 Site Plan
 Scale at A3: 1:1250 Job Number: 1684
 Date: 08/10/2014 Drawing: ?
 Status: X Checked: ?
 Drawing No: 1684-J000-XXX Revision: -



Our ref: 02B450664

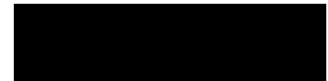
18th November 2014

Planning Policy Team
3N/02
Residents Services
Civic Centre
High Street
Uxbridge
UB8 1UW



gva.co.uk

Dear Sir or Madam



Proposed Submission Local Plan Part 2 – Site Allocations and Designations Consultation

We write further to our letter of representation dated 3rd November 2014 on behalf of our client, Transport for London (TfL). As you will be aware, our representation promoted the allocation of Land at Green Lane / Station Approach, Northwood for mixed-use development.

At the time of our representation, our client was in the process of concluding their initial engagement with the local community which had been on-going since July 2014. The outcome of this period of engagement was reported back to the local community on the 4th November 2014. It was noted within our representation that this was also the closing date of the Proposed Submission Local Plan Part 2 consultation. As this process of engagement was still on-going at this time, it was considered premature to provide comment on the consultation process prior to its conclusion, as this would not have afforded my client the time required to properly consider the feedback received from the local community. As such, our representation clearly stated our client's intention to submit further information following the close of the consultation on 4th November.

Our client has now had the opportunity to review the outcome of their engagement process. This identified general support from the local community for TfL to bring forward a mixed-use development on the site, as suggested in the previous representation. We recognise that although this will be received after the published deadline, we trust it will be considered alongside our initial representation.

As previously identified, TfL is keen to work closely with the LB Hillingdon and the local community to bring forward a positive mixed-use development on the site. The Site Allocations DPD provides the opportunity to recognise the potential the site can play in delivering a scheme which provides positive growth and sustainable development, the underlying principles of the NPPF.

We trust this additional representation will be considered, and would like to take the opportunity to reiterate our request for a meeting with you to discuss our proposed representation.

Yours sincerely



Tim Sturgess
Senior Planner

For and on behalf of GVA Grimley Ltd

Ickenham Residents' Association 4\11\14

Initial Local Plan consultation response

Given the very short 6 weeks consultation period, here are our initial comments. We reserve the right to submit further comments if required. Also, we did not have time to categorise our comments as requested. We were also worried that mis-categorisation of comments could result in them being ruled out of consideration.

Local Centre designation: it would be useful if there was a description of what this means, in the context of the other designations. We are unsure of the rationale for the exclusion of some of Ickenham's shopping areas – so we'd recommend including all of the shops in the village centre – both sides of the High Rd.

We noticed that Glebe Avenue parade is not mentioned in the shopping parades list – it should be.

On Housing Mix, we noted the reference to the demand for 'living above shops' (4.7\4.8). We wondered what the rationale was for this reference – and ask that it be explained in the document.

On DMH6 4.17 – There's a reference to 'back garden' developments. We feel that this should be 'garden developments'. This would align better with national policy and would encompass developments on gardens to the side of homes.

Heritage – Not clear why the various conservation areas are designated – it should be made clear – in every instance – what a conservation area is conserving. This links to a wider point about whether Ickenham could\should (already does?) have a Management Plan for its CA.

DMHB18 – Needs updating to include secondary school provision. Borough has had significant Primary School growth since 2013 (30 extra classes) –so it'll be 2020 when we'll need an extra 30 Year 7 classes. Where are these going to be?

DMHB21 – Playgrounds – we think that much of Ickenham's Glebe Estate is in deficient – since the Compass Theatre playground was removed. We also seek clarification of the status of new playgrounds within new housing developments. Some appear 'fenced in' for exclusive use of residents of the new developments. Is this permitted under the policy requiring new housing to provide playgrounds?

On proposed green belt changes, we'd like the whole of the Ickenham Marshes Complex to be recognised as Green Belt. There is currently a section south of the Metropolitan Line railway that isn't categorised as Green Belt. We're not sure why, as it's exactly the same sort of hugely valuable mixed woodland\grassland habitat as the rest of the Marshes. The section doesn't even align with field or ownership boundaries – it really is an oddity which we'd like to see rectified. It fulfils all the same criteria for green belt designation as the land

that surrounds it. It's land that separates Ickenham from Ruislip Gardens – and as such is important to maintain to check the unrestricted sprawl of built-up areas. It prevents neighbouring towns merging into one another, it assists in safeguarding the countryside from encroachment and it's important to preserving special the rural character of Ickenham.

We would like to ensure that Glebe Allotment site's recent addition to the Borough's list of 'statutory sites' is confirmed in the relevant Local Plan maps.





Re: Local Plan Part 2 Consultation

1 message

LDF Consultation <ldfconsultation@hillington.gov.uk>

4 November 2014
14:03

To: Margaret White [REDACTED]
Cc: James Gleave <jgleave@hillington.gov.uk>, Local Plan <localplan@hillington.gov.uk>, Efua Dadze-Arthur <[REDACTED]>

Dear Ms White

Further to you call I can confirm receipt of your representation on the Hillingdon Local Plan Part 2.

Kind regards

Planning Policy Team,
Residents Services,
London Borough of Hillingdon,
3N/02, Civic Centre,
High Street, Uxbridge, UB8 1UW.

tel. 01895 250230

e-Mail: ldfconsultation@hillington.gov.uk www.hillingdon.gov.uk

On 2 November 2014 13:18, Margaret White <[REDACTED]> wrote:

Dear Sir/Madam,

I am writing to submit my comments on the Council's Draft Development Management Policies and Site Allocations as follows:

Development Management Policy DMEI 5: Development in Green Chains

This draft policy represents a serious weakening of the Green Chain Policy adopted in Part 1 of the Local Plan which stated:

“Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.”

Local residents in Ruislip and Eastcote have become very well aware of the threat to our Green Chain areas through repeated applications by Eastcote Hockey and Badminton Club to build a second artificial hockey pitch surrounded by 4m high fencing and 15m high floodlights in the middle of Kings College Playing fields. This forms part of the River Pinn Green Chain and route of the Celandine Way a highly valued 10 mile footpath route from Pinner through Eastcote, Ickenham, Uxbridge, Cowley to Yiewsley.

The earlier planning applications were considered consistent with Green Chain policy by the development control officer in his interpretation of the earlier Green Chain Policy to the very great dismay of local residents. However, following a strengthening of the Green Chain Policy as stated above in the Local Plan Part 1, a later planning application by the Hockey Club was considered to be contrary to the new Green Chain Policy by both the development control officer and by the Policy Team in a report to North Planning Committee on 26th March 2013 on the Hockey Club's third planning application which was subsequently withdrawn.

The new draft Green Chain Policy DMEI 5 represents a serious weakening of Green Chain Policy and is virtually identical to the earlier Policy prior to its amendment in the Local Plan Part 1.

In view of the very strong local opposition to the plans of the Hockey Club to build a one and half acre artificial pitch in the middle of this Green Chain site, represented by petitions of over 5,000 signatures against the last proposal, any weakening of the Green Chain policy by the Council which might allow such development in Green Chain areas in future would be viewed as a serious betrayal of the wishes of local people.

I would therefore strongly urge the Council to reject this proposed watering down of the Green Chain policy in favour of retention of the existing Green Chain policy EM2.

Site Allocations

The proposals for Site Allocations include at pages 115 to 122 a number of proposals to remove sites from Green Chain designation and include them in Metropolitan Open Land designation. These sites are:

- Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway at High Road Eastcote, Eastcote Village
- Kings College Playing Fields at Kings College Road, Ruislip
- Manor Farm and Winston Churchill Hall on Pinn Way, Ruislip
- Falling Lane Recreation Ground, Yiewsley
- Field End Recreation Ground, Ruislip Manor
- Torcross Road and Mount Pleasant Parkway, Ruislip Manor
- New Pond Playing Fields, Sidmouth Drive Recreation Grounds and West End Road Open Space, Ruislip

I have no objection to the designation of these areas as Metropolitan Open Land. However, I do object to their removal from Green Chain designation. The fact that these sites may meet the criteria for MOL designation does not mean that they are any the less appropriate areas for Green Chain designation. The Green Chain policy recognises the designated areas special environmental character and the need to protect this and maintain the links between open areas within a largely built up environment.

I believe it is important that these areas retain the specific protection of the Green Chain policy as otherwise they may become vulnerable to pressures for development of fenced and floodlit artificial pitches similar to the Eastcote Hockey Club's proposals for Kings College Playing Fields referred to above. I do not consider that MOL designation alone would be sufficient to oppose such development. Indeed there are a number of such artificial football pitches on Green Belt land in Hillingdon. Such development on Green Belt or MOL land might be supported by a "very special circumstances" case. However, it would still be considered contrary to policy if these areas remain protected by the current Green Chain policy EM2 in Local Plan Part 1.

I therefore urge the Council to retain Green Chain designation for these sites, perhaps in addition to an MOL designation. I understand a number of other London Boroughs have already adopted dual MOL and Green Chain designations for appropriate sites in their areas. I consider such dual designation would be consistent with the London Plan Green Grid policies.

Yours faithfully,

Martin White

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2014.0.4765 / Virus Database: 4189/8495 - Release Date: 11/02/14

IP46



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	COUNCILLOR		
First name	IAN		
Last Name	EDWARDS		
Organisation (if relevant)	LBM		
Unit		House number	
House name	CIVIC CENTRE		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The plan fails to include the 'Old Coal Yard' site in Tawitock Road Yarnsby. This is/was industrial land that is no longer needed. The adhoc industrial & storage uses result in unacceptable HGV movements in a residential road & serious congestion at the junction with the High Street.

The plan & ^{map} should clearly show the future designation of that land & it should be included as a site for development.

Please continue on a separate sheet if necessary

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 1.2 Local Parades
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The local parade in Violet Avenue Yewsey is omitted from the plan

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Inclusion of the parcel at Violet Avenue.

Please continue on a separate sheet if necessary

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA 28 = 29 .
Paragraph Number; or	
Table or Figure Number; or	APPENDIX B - YESSLEY TOWN CENTRE
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Yewisley Town Centre Boundary has not been reviewed / reconsidered in light of the substantial developments sites at Packcroft Works (p73) & Trout Road (p74). The former is identified as suitable for residential & is wholly within the present Town Centre boundary. The latter is outside the Town Centre but is proposed for mixed use & designated as town centre. In light of these substantial changes the boundary to the Town Centre should have been reviewed & altered accordingly.

NB error in page numbers within Table 3.2 p14. Site Allocation

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Yusby Town Centre boundary to be reviewed & adjusted to take into account ~~the~~ Policy SA 28 + SA 29.

Please continue on a separate sheet if necessary

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	GREEN BELT DELETIONS
Paragraph Number; or	p103 SA-D.
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The area of Green Belt to the South of Trout Road immediately after the canal river is not serving its purpose as it contains numerous semi industrial / waste storage sites together with a small number of houses. The area outside and to the South / South East of the Nature Conservation Site of Metropolitan or Boreyal Grade 1 importance should be deleted from the Green Belt. This land might be considered together with The Old Coal Yard Tawstock Road as a substantial site for redevelopment.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Deletion from the Green Belt of land to the South of Trout Road that is not within the Nature Conservation Site.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingsdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingsdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

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1. Name and Address	
Title	Mr
First name	ANTHONY
Last Name	WILKINSON
Organisation (if relevant)	
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	5.1

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

I would like to add my full support to the change shown in Map 5.1 on page 36. Namely "Land west of Merle Avenue Horefield".

I own a small portion of the land in the south east corner of the area to be added to the green belt. The South of the site is a copse and in the past few years 100's of Horefield residents have signed ~~two~~ petitions opposing development in the copse. I am sure that they would all support the addition of the copse to the green belt as I do.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

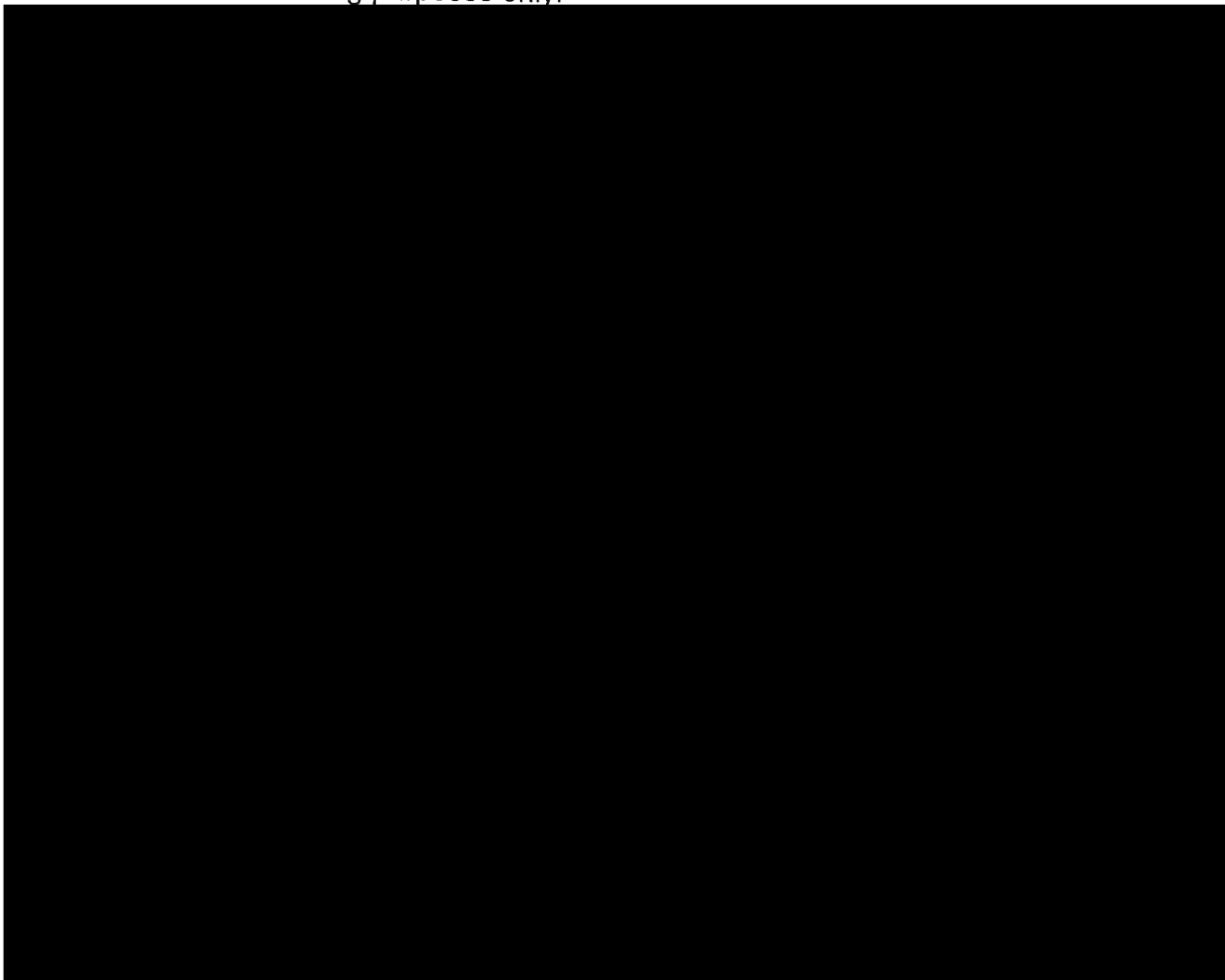
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions


The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Michael
Last name	Philpott
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2
	Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number	EM2 and OL11
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input checked="" type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The change in designation of Kings College playing fields from Green Chain (GC) to Metropolitan Open Land (MOL) does not give this land adequate protection against development threats and so does not reflect the needs of local LBH residents. This is evidenced by the recent three attempts by the Eastcote Hockey Club to take a large section of these fields over for their own exclusive benefit. Local residents need protection from this and other future threats by retaining the GC designation for this land.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording

Many London boroughs have given dual designation to public amenity areas such as Kings College Playing Fields. If they are to be designated as MOL, they should retain their GC designation as well. There is plenty of precedent for dual designation such as this.

of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

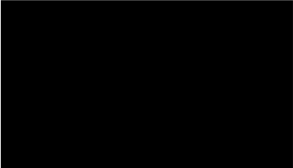
Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mrs
First name	Carey
Last name	Philpott
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2
	Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

I do not feel it is in the best interests of Hillingdon residents. We want dual designation of BOTH Metropolitan land and Green chain. We are local residents and support Friends of Pinn Meadows who represent local residents.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Dual designation of Metropolitan land and Green chain.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of

No

the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
 First name John
 Last name McDonnell MP
 Address

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)

Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number EM2
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you Yes

The land known locally as Charville Fields and Hayes Park situated in Charville Ward does not have the right protection. This land needs to be upgraded in order to be protected against speculative developers in the area.

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
 First name John
 Last name McDonnell MP
 Address

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)

Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number EM2
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The land at the side of Hayes Park in Charville does not have the adequate protection and should be upgraded from a site of nature interest to Green Belt to provide full protection of that piece of land

If your representation is seeking a change, do you No

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	John
Last name	Oswell
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	EM2
Paragraph number	5.6
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)	The land known locally as Charville Fields and Hayes Park situated in Charville Ward does not have the right protection. This land needs to be upgraded in order to be protected against speculative developers in the area.
---	--

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?	Yes
--	-----

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

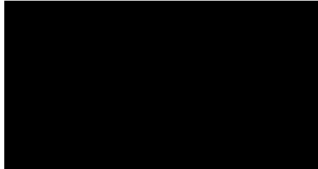
Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	John
Last name	Oswell
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number
Paragraph number
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The land at the side of Hayes Park in Charville does not have the adequate protection and should be upgraded from a site of nature interest to Green Belt to provide full protection of that piece of land

If your representation is seeking a change, do you consider it necessary to participate in the oral part of

No

the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring




any of the additional details you do not

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Chris
Last name	Boultbee
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	DMHB22
Paragraph number	A
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)	The Policy should include limits for two storey rear extensions
---	---

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)	Part of HDAS paragraph 6.4 and all of para 6.5 should be included as shown in the attachment
---	--

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?	No
--	----

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) Comments on Local Plan Part 2 Policy DMHB22 A).pdf

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



**Comments on Local Plan Part 2 - Development Management Policies:
September 2014**

Policy DMHB22: Alteration and Extensions to Residential Dwellings

A) Rear Extensions

i) Single storey rear extensions on terraced or semi-detached houses with a plot width of 5 metres or less should not exceed 3 metres in depth or 3.6 metres where the plot width is 5 metres or more;

ii) Single storey rear extensions to detached houses with a plot width of 5 metres or more should not exceed 4.0 metres in depth;

iii) Flat roofed single storey extensions, including those with a crown roof, should not exceed 3.0 metres in height and any pitched or sloping roofs should not exceed 3.4 metre in height measured from ground level;

iv) Balconies or access to flat roofs which result in loss of privacy to nearby dwellings or gardens will not be permitted;

v) Two storey extensions should not extend into an area provided by a 45-degree line of sight drawn from the centre of the nearest ground or first floor habitable room window of an adjacent property (see Diagram 2.2 below) and should not contain windows or other openings that overlook other houses at a distance of less than 21 metres.

vi) Two storey extensions should not protrude out too far from the rear wall of the original house. If this can be achieved then the maximum depths identified below can be applied, however, these should not be exceeded (the dimensions illustrated are external and include any overhanging roof guttering added to the rear wall of the extension):

- End-of-terraced/semi-detached houses (including end terrace) on a plot less than 5m wide - 3.3m**
- End-of-terrace/semi detached/terraced houses on a plot more than 5m wide - 3.6m (12ft)**
- Detached houses 4m (13.33ft)**

These dimensions are applicable to first time extensions and are taken from the rear wall of the original house. Second extensions or canopies added to existing extensions may well result in the depth limits being exceeded and be out of character with the original building and will usually be refused permission.

vii)-Flat roofed two storey extensions will not be acceptable.

vii) Pitched roofs on extensions should be of a similar pitch to that of the original roof and should be subordinate to the existing roof with a highest point or ridge at least 0.5 metres below that of the eaves.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Chris
Last name	Boulton
Address	[REDACTED]
Postcode	[REDACTED]
Telephone, including area code	[REDACTED]
Email	[REDACTED]
Organisation (if relevant)	[REDACTED]

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2
	Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number	DMHB8
Paragraph number	2
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input checked="" type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

This policy should be applicable to extensions of existing properties as well as new houses.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

proposed change: change 'new houses' to 'new development' or 'new development and extensions to dwellings'

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.


Monitoring



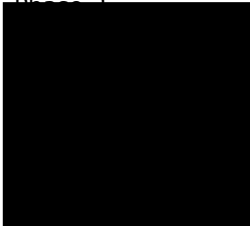
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Nothing selected
First name	L.B.Hillingdon
Last name	
Address	Labour Group Office
	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Cllr
First name	Janet
Last name	Duncan
Address	Labour Group Office
	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number
Paragraph number
Table or figure number
Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

All comments previously submitted today

Please set out what change(s) you consider necessary

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In addition to those reasons submitted earlier an additional reason is to represent the views of local communities on these matters.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

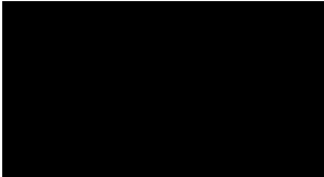
Monitoring




Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Nothing selected
First name	L B Hillingdon Labour Group
Last name	
Address	Labour Group Office Phase II
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Cllr
First name	Janet
Last name	Duncan
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Policy DMT5 Page 126: Pedestrians and cyclists
Paragraph number	Proposed new sub para (iv)
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is

- Sound
- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Development proposals can sometimes cause longer or more difficult journeys for pedestrians and cyclists. Existing facilities need to be protected for these users to encourage walking and cycling.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, Amend policy with additional sub para (iv): "No lengthening or increased difficulty being caused to existing pedestrian and cycle access."

legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary. To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DMT6, Page 128: Vehicle parking
Paragraph number (B)
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Hillingdon has a policy of providing vehicle parking spaces for residents over 65 as part of their policies for older people to give greater independence and mobility and ensure access to more facilities for them. Policy should be amended to include this successful local policy.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Amend (B) by inserting: "people over 65" after "wheelchair users" to read: "All car parks provided for new development will be required to contain conveniently located reserved spaces for wheelchair users, people over 65 and those with restricted mobility ..."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary. To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DMT7, Page 129: Freight
Paragraph number Proposed new paragraph (C)
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The whole of Hillingdon is an Air Quality Management Area but 50% of all air pollution is caused by HGVs. High HGV generating uses should therefore be carefully located to protect human health and comply with general Part 1 policies and national and European policies.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add new paragraph "(C) Proposals giving rise to a high generation of HGVs must be carefully located due to their disproportionately high impact on air quality and human health."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMAV1, Page 131: Safe Operation of Airports

Paragraph number

(B) (i)

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Typo.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Duplication of "Which may" in second line needs to be removed.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this

necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Policies Map (Atlas of Changes)

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Yiewsley

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The removal of the Old Coal Yard site in Tavistock Road, Yiewsley from the IBA designation is supported as detailed work and information have shown that it is not suitable for this designation and high generation of HGVs. The close proximity of the site to a Crossrail station and bus station would encourage mixed use development which minimizes the need for car parking and does not generate HGV traffic. Crossrail investment encouraging higher employment uses should be maximized supporting both the local town centres of Yiewsley and West Drayton and the local economy. The removal of this site has made the plan more sound and good development achievable.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Lake Farm School P178

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Lake Farm School is still shown as being in the Green Belt, when it is now a developed site and no longer fulfills the Green Belt function. Ruislip High School at Sidmouth Drive (Page 130) is shown as being deleted from the Green Chain as it is now a developed site and does not fulfill a Green Chain function.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Remove Lake Farm School from the Green Belt in the same way as Ruislip High School as being removed from the Green Chain for consistency.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To explain.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Lake Gardens (P116)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Lake Gardens is proposed to be included in the Green Belt, however the site opposite has been developed as Lake Farm School (P178) and no longer fulfills the Green Belt function. This has resulted in Lake Gardens becoming an island site which should be recognized in its designation.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Lake Gardens should be left as Metropolitan Open Land to more accurately reflect its situation as an island site.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

New Homes, Pages 13 - 82

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

A situation has arisen whereby new homes are being provided but insufficient supporting social infrastructure is inadequate. It has been difficult to provide primary education facilities but health and community facilities have fallen behind. This needs to be addressed when identifying sites for development in Part 2 so that measures can be taken to address this lack of provision.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In all sites designated for new homes (pages 13-82) provision must be made for health and education facilities as an absolute minimum before any new homes are occupied in order to place no unacceptable pressures on these services for existing residents and ensure sufficiency for new residents. Ways in which this can be done must be made clear before development commences so that essential facilities are delivered in accordance with Part 1 of the Plan. Provision should also be made for community facilities within development sites either for community groups to run or purchase, as required.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Page 176: School Sites

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Although primary schools have been provided no secondary school sites have been identified. It is understood that in addition to existing capacity, a further 27 forms of entry have been identified as being needed by 2022 within the period of the Plan. Some are required as early as 2016/17.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Sites should be identified for new secondary schools to ensure essential educational provision.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



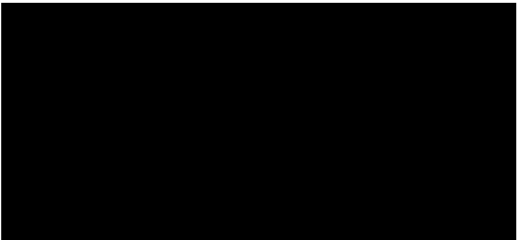
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Nothing selected
First name	L B Hillingdon Labour Group
Last name	
Address	Labour Group Office
	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Cllr
First name	Janet
Last name	Duncan
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Proposed new policy DMH10 Page 38 Sustainable Living
Paragraph number	Proposed new policy DMH10
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Obscured glazed windows are being provided in habitable room housing proposals. This is not considered sustainable or acceptable in accordance with national, regional and local policy.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, Proposed new policy DMH10 to read: "Where new housing is proposed or converted, obscured glazed windows to any rooms other than bathrooms should be resisted in order to

legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)
If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

maximize natural light, reduce the energy consumption of occupants and provide more acceptable living standards for residents."

Yes

To clarify and explain effects of current practices.

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Proposed New Policy DMH11 Page 38 Sustainable Living

Paragraph number

Proposed New Policy DMH11

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

New housing is being permitted in areas where air quality is above the legally safe limit to protect human health. Planning permission is being allowed subject to air ingress conditions that scrub air to a safe level within the building. This means residents cannot open their windows if they wish to protect their health and also that energy is used to run these air cleaning systems. This is not a sustainable form of development either now or for the future and a new policy is therefore proposed as follows:

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

A new policy DMH11 to state: "New housing should not be permitted on sites and in areas where air quality is above the legally safe limit to protect health."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify and explain.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Proposed New Policy DMH12 Page 38 Ensuring Balanced

Paragraph number

Provision of essential infrastructure

Table or figure number

Proposed New Policy DMH12

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before occupancy of any housing takes place in order to avoid unacceptable and undue pressures on existing residents, as well as insufficient provision for new residents. At present, new housing proposals are being permitted with no or very little accompanying provision of social infrastructure to support both existing and new residents. This needs to be addressed and a new policy is proposed therefore.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New policy DMH12 proposed "Increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before occupancy of the housing takes place in order to avoid unacceptable and undue pressures on existing residents, as well as insufficient provision for new residents."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

This is an important planning issue.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DMHB12 Page 50 High Buildings and Structures
Paragraph number Proposed bullet points (xiii) and (xiv)
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

New development is being permitted that is higher than buildings of importance, landmark buildings of the area and buildings that determine the character of the area. In certain cases these may be heritage assets where it is important to protect the setting, as well as the building itself. This is unacceptable if the character and built heritage is to be preserved and carried forward.

Please set out what change(s) you consider necessary Amend policy DMHB12 by introducing two new sub clauses:

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

"(xiii) Be subsidiary in height to landmark buildings, buildings of importance or those that determine the character of the area.

(xiv) Be subsidiary in height to heritage assets and respect their setting.

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To explain the need for this policy.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB13 Page 51 Preserving Hillingdon's Character

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Hillingdon's green and open character is being changed by high density developments that do not always preserve soft landscaping or mature trees and planting. This is adding to flood risks in some cases and removing trees that could help to trap air pollution and reduce the effects of air pollution on human health. This needs to be addressed specifically in the plan.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add additional clause to DMHB13 "In order to respect and preserve Hillingdon's green and open character and help to mitigate flood risk, at least 30% of redevelopment sites should be soft landscaped and include specimen trees."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify and explain.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB15 Page 55: Planning for Safer Places

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

In some cases of residential development, amenity space and children's play areas are not overlooked by the development. This can lead to anti-social behaviour and avoidable risks to residents. In order to reduce crime and anti-social behaviour and support safe and secure living conditions for all residents, therefore a new sub paragraph (vi) is proposed.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New sub paragraph (vi): "Ensure in all new residential development that all amenity space and children's play areas are overlooked by the development to maximise natural surveillance and safety for users."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DME10: Page 87: Management of Flood Risk

Paragraph number

Proposed additional paragraph

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Flood risk and increasing air pollution in the borough require robust measures at all levels to address these issues.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New paragraph proposed in policy DME10: "Programmes of tree planting will be supported in streets and public places to help reduce flood risk and trap air pollution."

If your representation is seeking a change, do you

Yes

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DME18, Page 93: Air Quality

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Air quality is worsening in the borough with consequent effects on human health of the borough's population.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New bullet heading (i): New housing will be resisted on sites and in areas where air quality is above the legally safe limit for human health.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

New bullet heading (ii): Trees which trap air pollution will be part of landscaping schemes for development proposals.

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Policy DMCI1, Page 104, Retention of Existing Community, Sport and Education Facilities

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound,

It has not been positively prepared

indicate your reasons

-
- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

This policy is not worded to protect existing facilities strongly enough.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy should be amended to read: "Proposals involving ... will not be permitted unless ..."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMCI8, Page 114, Planning Obligations and Community Infrastructure Levy
Proposed new paragraph D)

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

There is evidence that CIL contributions are causing developers to reduce the provision of affordable housing in schemes. There is therefore ambiguity as to which policy should take precedence. In view of the pressing need for affordable housing, it is proposed that housing provision be maximised.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add additional section to policy: "D) Where CIL contributions reduce the provision of affordable housing on a site this should be reviewed to maximise the amount of affordable housing provided."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

For clarity.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



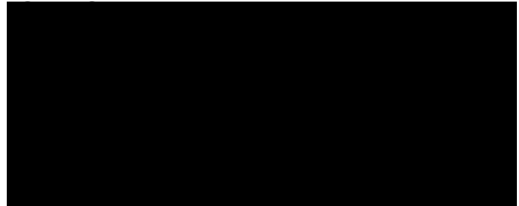
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Nothing selected
First name	L.B.Hillingdon
Last name	
Address	Labour Group Offices Phase2

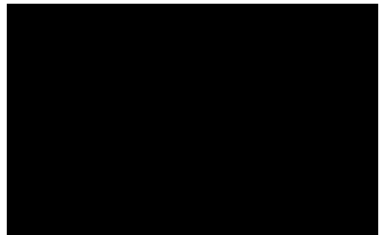
Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)



Agent's name and address (if applicable)

Title	Cllr
First name	Janet
Last name	Duncan
Address	Labour Group Offices

Postcode
 Telephone, including area code
 Email
 Company



Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Proposed New Policy DMH9 page 38 Lifetime Homes
Paragraph number	Proposed New Policy DMH9
Table or figure number	
Map number (Atlas of Changes)	

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Lifetime homes should accommodate mobility needs of residents who may develop permanent or temporary disability during their lifetime otherwise they are not lifetime homes

Please set out what change(s) you consider necessary New Policy to be introduced DMH9 stating

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

"All new homes should be built to Lifetime Homes standards and have at least one car parking space allocated to it to secure lifetime mobility for residents. Additional parking space for carers should be considered as required."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary. To explain and clarify the proposal.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

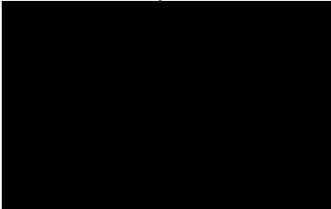
Monitoring




Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Nothing selected
First name	L B Hillingdon Labour Group
Last name	
Address	Labour Group Office
	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Cllr
First name	Janet
Last name	Duncan
Address	Labour Group Office
	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Proposed new policy DMH10 Page 38 Sustainable Living
Paragraph number	Proposed new policy DMH10
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Obscured glazed windows are being provided in habitable room housing proposals. This is not considered sustainable or acceptable in accordance with national, regional and local policy.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate,

Proposed new policy DMH10 to read: "Where new housing is proposed or converted, obscured glazed windows to any rooms other than bathrooms should be resisted in order to

legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)
If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

maximize natural light, reduce the energy consumption of occupants and provide more acceptable living standards for residents."

Yes

To clarify and explain effects of current practices.

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Proposed New Policy DMH11 Page 38 Sustainable Living

Paragraph number

Proposed New Policy DMH11

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

New housing is being permitted in areas where air quality is above the legally safe limit to protect human health. Planning permission is being allowed subject to air ingress conditions that scrub air to a safe level within the building. This means residents cannot open their windows if they wish to protect their health and also that energy is used to run these air cleaning systems. This is not a sustainable form of development either now or for the future and a new policy is therefore proposed as follows:

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

A new policy DMH11 to state: "New housing should not be permitted on sites and in areas where air quality is above the legally safe limit to protect health."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify and explain.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Proposed New Policy DMH12 Page 38 Ensuring Balanced

Paragraph number

Provision of essential infrastructure

Table or figure number

Proposed New Policy DMH12

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before occupancy of any housing takes place in order to avoid unacceptable and undue pressures on existing residents, as well as insufficient provision for new residents. At present, new housing proposals are being permitted with no or very little accompanying provision of social infrastructure to support both existing and new residents. This needs to be addressed and a new policy is proposed therefore.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New policy DMH12 proposed "Increase in housing provision should be accompanied by an appropriate increase in health, education, community, recreational and leisure facilities and these should be secured before occupancy of the housing takes place in order to avoid unacceptable and undue pressures on existing residents, as well as insufficient provision for new residents."

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

This is an important planning issue.

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB12 Page 50 High Buildings and Structures

Paragraph number

Proposed bullet points (xiii) and (xiv)

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

New development is being permitted that is higher than buildings of importance, landmark buildings of the area and buildings that determine the character of the area. In certain cases these may be heritage assets where it is important to protect the setting, as well as the building itself. This is unacceptable if the character and built heritage is to be preserved and carried forward.

Please set out what change(s) you consider necessary Amend policy DMHB12 by introducing two new sub clauses:

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

"(xiii) Be subsidiary in height to landmark buildings, buildings of importance or those that determine the character of the area.

(xiv) Be subsidiary in height to heritage assets and respect their setting.

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To explain the need for this policy.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB13 Page 51 Preserving Hillingdon's Character

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Hillingdon's green and open character is being changed by high density developments that do not always preserve soft landscaping or mature trees and planting. This is adding to flood risks in some cases and removing trees that could help to trap air pollution and reduce the effects of air pollution on human health. This needs to be addressed specifically in the plan.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add additional clause to DMHB13 "In order to respect and preserve Hillingdon's green and open character and help to mitigate flood risk, at least 30% of redevelopment sites should be soft landscaped and include specimen trees."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify and explain.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB15 Page 55: Planning for Safer Places

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

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If you consider the Local Plan Part 2 to be unsound, indicate your reasons

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It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

In some cases of residential development, amenity space and children's play areas are not overlooked by the development. This can lead to anti-social behaviour and avoidable risks to residents. In order to reduce crime and anti-social behaviour and support safe and secure living conditions for all residents, therefore a new sub paragraph (vi) is proposed.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New sub paragraph (vi): "Ensure in all new residential development that all amenity space and children's play areas are overlooked by the development to maximise natural surveillance and safety for users."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DME10: Page 87: Management of Flood Risk

Paragraph number

Proposed additional paragraph

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

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It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Flood risk and increasing air pollution in the borough require robust measures at all levels to address these issues.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New paragraph proposed in policy DME10: "Programmes of tree planting will be supported in streets and public places to help reduce flood risk and trap air pollution."

If your representation is seeking a change, do you

Yes

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

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I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DME18, Page 93: Air Quality

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

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Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Air quality is worsening in the borough with consequent effects on human health of the borough's population.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New bullet heading (i): New housing will be resisted on sites and in areas where air quality is above the legally safe limit for human health.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

New bullet heading (ii): Trees which trap air pollution will be part of landscaping schemes for development proposals.

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

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I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Policy DMCI1, Page 104, Retention of Existing Community, Sport and Education Facilities

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

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If you consider the Local Plan Part 2 to be unsound,

It has not been positively prepared

indicate your reasons

-
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- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

This policy is not worded to protect existing facilities strongly enough.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy should be amended to read: "Proposals involving ... will not be permitted unless ..."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMCI8, Page 114, Planning Obligations and Community Infrastructure Levy
Proposed new paragraph D)

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

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There is evidence that CIL contributions are causing developers to reduce the provision of affordable housing in schemes. There is therefore ambiguity as to which policy should take precedence. In view of the pressing need for affordable housing, it is proposed that housing provision be maximised.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add additional section to policy: "D) Where CIL contributions reduce the provision of affordable housing on a site this should be reviewed to maximise the amount of affordable housing provided."

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

For clarity.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



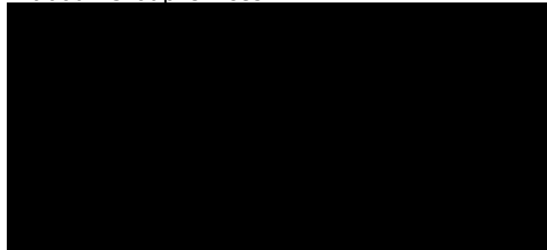
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Nothing selected
 First name L.B.Hillingdon Labour Group
 Last name
 Address Labour Group Offices

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)



Agent's name and address (if applicable)

Title Cllr
 First name Janet
 Last name Duncan
 Address Labour Group Offices

Postcode
 Telephone, including area code
 Email
 Company



Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DME2
 Paragraph number Bullet point 2
 Table or figure number
 Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It does not consider suitability of access

Please set out what change(s) you consider necessary Bullet point 2 should be amended to insert "or unsuitability"

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

after "lack" to read "the site is unsuitable for industrial reuse or development because of its size, shape, location or lack or unsuitability of access"

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To clarify this point

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



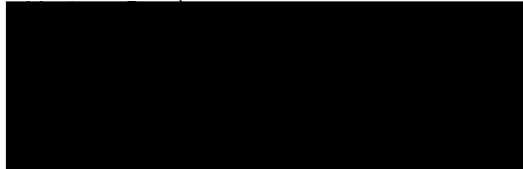
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Mark
Last name	Mathews
Address	Clearwatercourt

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)



Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number Whole Document
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Thames Water has the following comments to make on the site specific allocations identified in the consultation document

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you No

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) Hillingdon - LDF - Local Plan Part 2 Development Management Policies Site Allocations2.xlsx

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

What is your gender	Nothing selected
To which age group do you belong	Nothing selected
Do you consider yourself to be a disabled person?	Nothing selected
How would you describe your ethnic origin? You may wish to use one of the following categories (please tick), or add additional detail if you so wish.	Nothing selected

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
 First name mark
 Last name Mathews
 Address Clearwater court

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)

Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number Omission of policy
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Thames Water notes the Omission of a policy which specifically deals with Water and wastewater Infrastructure

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Thames Water would promote the inclusion of the following policy and supporting text within the Local Plan to ensure that any necessary upgrades are delivered. The policy would be applicable to all developments which increase demand for water and wastewater infrastructure. Water and Wastewater Infrastructure Policy Planning permission will only be granted for developments

which increase the demand for off-site service infrastructure where:

1. sufficient capacity already exists or
 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.
- Where there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.

Proposed new policy supporting text:

The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.

The inclusion of the above policy would be consistent with paragraph 156 of the NPPF and Policy 5.14 of the London Plan.

In addition to the above policy to ensure that any necessary upgrades required to support growth are delivered alongside development, water and sewerage undertakers can be required to undertake development in order to provide environmental quality improvements and enhanced services. As such a policy should be provided to support such infrastructure development and suggested wording is provided below. This policy would again be consistent with paragraph 156 of the NPPF and Policy 5.14 of the London Plan.

Water and Wastewater Infrastructure Development Policy
The development or expansion of water and wastewater facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.

No

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of

the Local Plan Part 2.



The adoption of the Local Plan Part 2.

Monitoring

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

What is your gender	Nothing selected
To which age group do you belong	Nothing selected
Do you consider yourself to be a disabled person?	Nothing selected
How would you describe your ethnic origin? You may wish to use one of the following categories (please tick), or add additional detail if you so wish.	Nothing selected

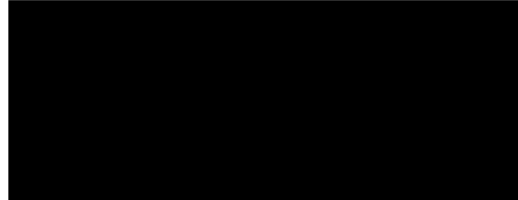
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
First name Mark
Last name Mathews
Address

Postcode
Telephone, including area code
Email
Organisation (if relevant)



Agent's name and address (if applicable)

Title Miss
First name
Last name
Address
Postcode
Telephone, including area code
Email
Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DMEI10
Paragraph number
Table or figure number
Map number (Atlas of Changes)

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Thames Water support the inclusion of policy DMEI10. However we do not believe it to be effective as there is no reference to sewer flooding. The NPPF states at paragraph 100 that a sequential approach should be used by local planning authorities to avoid inappropriate development in areas at risk of flooding. The NPPG sets out that this applies in areas to be at risk from forms of flooding other than from river and sea including from 'overwhelmed sewers and drainage systems' .

Any flood risk policy should therefore include reference to sewer flooding and an acceptance that flooding could occur

away from the flood plain as a result of development where off site infrastructure is not in place ahead of development. It is vital that sewerage/waste water treatment infrastructure is in place ahead of development if sewer flooding issues are to be avoided. This therefore increases the importance of Thames Water's representations regarding a specific water supply and sewerage infrastructure policy.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

What is your gender Male
To which age group do you belong Nothing selected
Do you consider yourself to be a disabled person? Nothing selected
How would you describe your ethnic origin? You may wish to use one of the following categories (please tick), or add additional detail if you so wish. Nothing selected

All Sites for Development Plan Hillingdon - LDF - Local Plan Part 2 Development Management Policies & Site Allocations									
Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	42577	269-285 Field End Road, Eastcote	Waste		N/A	91080	1.05	23	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42583	297-299 Long Lane, Hillingdon	Waste		N/A	99000	1.15	25	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42588	Cape Boards Site, Iver Lane, Cowley	Waste		N/A	1247400	14.44	315	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42581	Chailey Industrial Estate, Pump Lane, Hayes	Waste		N/A	594000	6.88	150	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42578	Charles Wilson Engineers, Uxbridge Road	Waste		N/A	170280	1.97	43	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan: "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."
02/10/2014	42572	Enterprise House, Hayes	Waste		N/A	316800	3.67	80	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	36379	FORMER ARLA FOOD DEPOT VICTORIA R	Waste		N/A	466567.2	5.4	118	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42589	Former Vehicle Testing Station, Cygnet Way	Waste		N/A	364320	4.22	92	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42591	Hayes Bridge, Uxbridge Road, Hayes	Waste		N/A	158400	1.83	40	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.

All Sites for Development Plan Hillingdon - LDF - Local Plan Part 2 Development Management Policies & Site Allocations									
Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	42584	High Street / Bakers Row, Uxbridge	Waste		N/A	99000	1.15	25	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	16494	Initial House, Field End Road	Waste		N/A	166320	1.93	42	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	24194	Land to the rear of 119-137 Charville Lane	Waste		N/A	49500	0.57	13	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42585	Martin Close, Uxbridge	Waste		N/A	190080	2.2	48	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	7572	Olympic House, 1a Grove Lane, Hillingdon	Waste		N/A	28215	0.33	7	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42574	Packet Boat House, Packet Boat Lane, Cowl	Waste		N/A	101475	1.17	26	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42592	Padcroft Works, Tavistock Road, Yiewsley	Waste		N/A	823680	9.53	208	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	1465	Porters Way, West Drayton	Waste		N/A	2766390	32.02	699	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42579	Royal Mail Sorting Office, Park Way, Ruislip	Waste		N/A	87120	1.01	22	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	1401	Royal Quay, Summerhouse Lane	Waste		N/A	114840	1.33	29	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.

All Sites for Development Plan Hillingdon - LDF - Local Plan Part 2 Development Management Policies & Site Allocations									
Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	42582	Silverdale Road/Western View, Hayes	Waste		N/A	1188000	13.75	300	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	29389	Site A - Eastern End of Blyth Road, Hayes	Waste		N/A	502920	5.82	127	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42575	SITE A - Land to the South of the Railway, in	Waste		N/A	1980000	22.92	500	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	1429	SITE A - Master Brewer and Hillingdon Circus	Waste		N/A	811800	9.4	205	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42573	SITE B - Eastern End of Blyth Road, Hayes	Waste		N/A	506880	5.87	128	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42576	SITE B - Land to the South of the Railway, in	Waste		N/A	819720	9.49	207	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.

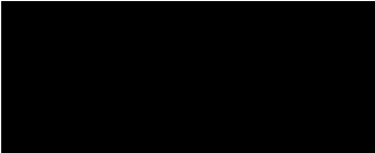
All Sites for Development Plan Hillingdon - LDF - Local Plan Part 2 Development Management Policies & Site Allocations									
Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	7584	SITE B - Master Brewer and Hillingdon Circus	Waste		N/A	728640	8.43	184	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42596	Site near Odyssey Business Park, South Ruislip	Waste		N/A	114840	1.33	29	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42597	St Andrew's Park – Annington Homes Site	Waste		N/A	475200	5.5	120	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	7569	St Andrews Park	Waste		N/A	6279900	72.68	1586	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	2197	The Old Vinyl Factory and Gatefold Building	Waste		N/A	2915998.8	33.75	736	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42594	Trout Road, Yiewsley	Waste		N/A	392040	4.54	99	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42595	Uxbridge Health Centre, Chippendale Way	Waste		N/A	59400	0.69	15	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42586	Valley Road, Uxbridge	Waste		N/A	221760	2.57	56	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.

All Sites for Development Plan Hillingdon - LDF - Local Plan Part 2 Development Management Policies & Site Allocations									
Created Date	Site ID	Site Name	ServiceType	Catchment Planner - Water	Responded? - Water	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	42580	West End Road, South Ruislip	Waste		N/A	174240	2.02	44	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	1935	Western Core, Hayes	Waste		N/A	237600	2.75	60	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.

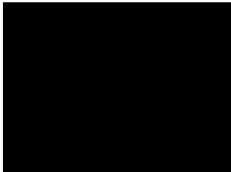
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Colin
Last name	Begeman
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Kitewood Ltd

Agent's name and address (if applicable)

Title	Mr
First name	Robert
Last name	Winkley
Address	
Postcode	
Telephone, including area code	
Email	
Company	Rolfe Judd Planning

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
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To which part of the Local Plan Part 2 does this representation relate:

Policy number	SA28
Paragraph number	3.7
Table or figure number	
Map number (Atlas of Changes)	17.27

Do you consider that the Local Plan Part 2 is	<input checked="" type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary We consider the inclusion of Padcroft Works as an allocated site (SA28) is sound and justified, given the extant consent for 208 housing units. However, since 2003 the Council has consistently pushed for a comprehensive rather than piecemeal approach to this site, which comprises a patchwork of complex and disparate land ownership. As

such, Kitewood considers the red line of Site SA28 to be too tightly drawn. Instead, the red line should include the properties fronting the High Street, TIGI House to the north west of the site, and COMAG to the east of the site.

We currently have a live planning application for 308 residential units on the combined Padcroft-TIGI site which, as a result of detailed pre-application discussions with the Council, has principled support from officers. In line with officers' advice, Kitewood has submitted a planning application which takes great care not to blight the development potential of the adjacent COMAG site as a residential-led site. We therefore believe it should be made clear, through the revised red line for SA28, that both the TIGI and COMAG sites be designated as suitable sites for residential development at a density comparable to the extant permission for 208 units. It is possible, and indeed probable, that the COMAG site will come forward as a development site over the life of the Local Plan. By drawing the red line plan around the entire site, the Council will send a reassuring signal that this site can be redeveloped without significant and fundamental planning hurdles to overcome.

We also consider that the neighbouring site to the south of Tavistock Road - the former Coal Depot site - has the potential to deliver a substantial mixed-use development in light of the forthcoming Crossrail station at West Drayton. We believe the Council should give serious consideration to allocating the Coal Depot site to ensure that it fulfils its potential to deliver a mixed use scheme which is compatible with the Town Centre designation and the forthcoming development at SA28.

No

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

141104 Padcroft-TIGI-COMAG site.pdf

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

tick), or add additional detail if you so wish.

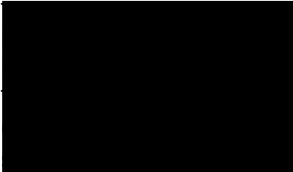
All Sites for Development Plan Hillingdon - LDF - Local Plan Part 2 Development Management Policies & Site Allocations									
Created Date	Site ID	Site Name	Service Type	Catchment Planner - Water	Responded? - Water	Net Gain to System (t/day)	Net Foul Water Increase to System (t/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	42577	269-285 Field End Road, Eastcote	Waste		N/A	91080	1.05	23	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42583	297-299 Lona Lane, Hillingdon	Waste		N/A	99000	1.15	25	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42588	Cape Boards Site, Iver Lane, Cowley	Waste		N/A	1247400	14.44	315	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42581	Chailey Industrial Estate, Pump Lane, Hayes	Waste		N/A	594000	6.88	150	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42578	Charles Wilson Engineers, Uxbridge Road	Waste		N/A	170280	1.97	43	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In this case we ask that the following paragraph is included in the Development Plan: "Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."
02/10/2014	42572	Enterprise House, Hayes	Waste		N/A	316800	3.67	80	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	36379	FORMER ARLA FOOD DEPOT VICTORIA R	Waste		N/A	466567.2	5.4	118	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42589	Former Vehicle Testing Station, Cynvet Way	Waste		N/A	364320	4.22	92	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42591	Hayes Bridge, Uxbridge Road, Hayes	Waste		N/A	158400	1.83	40	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42584	High Street / Bakers Row, Uxbridge	Waste		N/A	99000	1.15	25	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	16494	Initial House, Field End Road	Waste		N/A	166320	1.93	42	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	24194	Land to the rear of 119-137 Charville Lane	Waste		N/A	49500	0.57	13	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42585	Martin Close, Uxbridge	Waste		N/A	190080	2.2	48	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	7572	Olympic House, 1a Grove Lane, Hillingdon	Waste		N/A	28215	0.33	7	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42574	Packet Boat House, Packet Boat Lane, Cow	Waste		N/A	101475	1.17	26	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42592	Padcroft Works, Tavistock Road, Yiewsley	Waste		N/A	823680	9.53	208	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	1465	Porters Way, West Drayton	Waste		N/A	2766390	32.02	699	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42579	Royal Mail Sorting Office, Park Way, Ruslip	Waste		N/A	87120	1.01	22	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	1401	Royal Quay, Summerhouse Lane	Waste		N/A	114840	1.33	29	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42582	Silverdale Road/Western View, Hayes	Waste		N/A	1188000	13.75	300	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	29389	Site A - Eastern End of Blyth Road, Hayes	Waste		N/A	502920	5.82	127	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42575	SITE A - Land to the South of the Railway, ind	Waste		N/A	1980000	22.92	500	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	1429	SITE A - Master Brewer and Hillingdon Circus	Waste		N/A	811800	9.4	205	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42573	SITE B - Eastern End of Blyth Road, Hayes	Waste		N/A	506880	5.87	128	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42576	SITE B - Land to the South of the Railway, ind	Waste		N/A	819720	9.49	207	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.

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Created Date	Site ID	Site Name	Service Type	Catchment Planner - Water	Responded? - Water	Net Gain to System (l/day)	Net Foul Water Increase to System (l/s)	Net Property Equivalent Increase - Waste	Waste Response
02/10/2014	7584	SITE B - Master Brewer and Hillingdon Circus	Waste		N/A	728640	8.43	184	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42596	Site near Odyssey Business Park, South Ruislip	Waste		N/A	114840	1.33	29	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42597	St Andrew's Park – Annington Homes Site	Waste		N/A	475200	5.5	120	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	7569	St Andrews Park	Waste		N/A	6279900	72.68	1586	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	2197	The Old Vinyl Factory and Gatefold Building,	Waste		N/A	2915998.8	33.75	736	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42594	Trout Road, Yiewsley	Waste		N/A	392040	4.54	99	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	42595	Uxbridge Health Centre, Chippendale Wave	Waste		N/A	59400	0.69	15	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42596	Valley Road, Uxbridge	Waste		N/A	221760	2.57	56	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.
02/10/2014	42580	West End Road, South Ruislip	Waste		N/A	174240	2.02	44	We have concerns regarding Wastewater Services in relation to this site. Specifically, current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure to support the development. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be potentially necessary for the delivery of the infrastructure, alternatively the developer may wish to requisition the infrastructure to deliver it sooner. We are also likely to request a Grampian planning condition to ensure the infrastructure is in place ahead of occupation of the development.
02/10/2014	1935	Western Core, Haves	Waste		N/A	237600	2.75	60	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Stephen
Last name	Allen
Address	Heathrow Airport Limited
	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Heathrow Airport Limited

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Policies Map (Atlas of Changes)
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To which part of the Local Plan Part 2 does this representation relate:

Policy number	
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	Map 4.1

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input checked="" type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

HAL supports the deletion of Former Perry Oaks Sludge Works Site and considers the A3044 marks a logical boundary. However, a further area of Green Belt requires removal at the site of the T5 Business Car Park. The area of Green Belt covers the Longford Village Park on the southern side of the Village but its boundary follows a history alignment that pre-dates the works associated with the development of Terminal 5. Specifically, the Duke of Northumberland's River was re-routed around the western end of the airport and this severed the land to the south of Longford village.

The pocket of isolated land immediately to the south of the re-aligned river has since been converted into the T5 Business Car Park under planning permission 47853/APP/2005/1984, which included an agreement to re-provide the area of Green Belt lost with an area near the River Crane in the south eastern corner of the Airport which was previously used for lorry parking. In addition the area to the rear of the houses in Longford village and immediately to the north of the re-aligned river was landscaped and a small public park created. The Council has also recently confirmed that it had no objection to an additional deck of parking under the Airport's permitted development rights on part of this existing T5 Business Car Park, (see planning reference 69671/APP/2013/3871).

Given the site's isolation from other Green Belt land as a result of the re-alignment of the Duke of Northumberland's River and the development of this area as car parking, we do not consider that the land designated Green Belt at Longford Park to the south of the River serves a Green Belt functions. With reference to paragraph 80 of the NPPF, this site no longer:

- Checks the unrestricted sprawl of large built up areas;
- Assists in safeguarding the countryside from encroachment; or
- Preserves the setting and special character of historic towns.

We consider a more logical boundary for the Green Belt at this location would be the Duke of Northumberland's River. Having regard to paragraph 85 of the NPPF, defining the boundary along this River would:

- Ensure that it does not include land which is necessary to keep open;
- Not need to be altered at the end of the development plan period; and
- Defines the boundary clearly, using a physical feature that is readily recognisable and likely to be permanent.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The Green Belt boundary needs to be amended to align with the Duke of Northumberland's River. Ultimately, the amendment to the Green Belt boundary at this location would regularise the existing situation which has come about through a legitimate planning process. This would also honour the commitment made by Council officers during the Public Hearing when this issue was considered at the Part 1 stage of the Local Plan.

There is also a need to amend the boundary which defines the Airport so that it corresponds with the Green Belt boundary in this location.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this boundary change requires discussion and explanation

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

N3 car park permitted layout.pdf

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Key Transport Interchanges, Heathrow Bus Interchange

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We welcome the addition of the Heathrow Bus Interchange as a Designated Site, however we do not consider the boundary captures the true extent of this Key Transport Interchange. In our view, the boundary should encompass the whole Central Terminal Area recognising the important interchange functions that the terminals and the central bus station fulfil through integrating road, rail and air travel.

There should also be reference to the Central Terminal Area site as a multi-mode transport interchange, rather than simply a bus interchange. In addition to being the busiest bus and coach station in the UK, the CTA is also served by seven rail stations providing access to Heathrow Express, Heathrow Connect and Piccadilly line rail services. Both Terminals 4 and 5 have dedicated rail and Underground stations as well as bus and coach services. In this respect, we consider that Terminals 4 and 5 should each be designated as Key Transport Interchanges.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The boundary designation should encompass the whole of the CTA and acknowledge the multi-modal transport links rather than just the bus station.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Terminals 4 and 5 should also be acknowledged as key transport interchanges.

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Yes

We consider this designation requires discussion and explanation

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

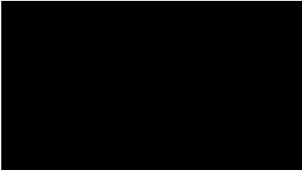
wish to use one of the following categories (please

tick), or add additional detail if you so wish.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Stephen
Last name	Allen
Address	Heathrow Airport Limited
	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Heathrow Airport Limited

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
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To which part of the Local Plan Part 2 does this representation relate:

Policy number	DME3
Paragraph number	2.22
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input checked="" type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME3 seeks to direct office development to the three core areas of Uxbridge Town Centre, Stockley Park and the Heathrow perimeter. However, none of these areas can match the public transport accessibility of Heathrow with its links to the Piccadilly Line, Heathrow Connect and Express rail services and the UK busiest bus and coach station. This accessibility is set to improve with the introduction of Crossrail. On top of these transport connections, the whole of Heathrow Airport is a free travel zone for any mode of public transport.

In our view, Heathrow's public transport nodes such as the

CTA, T4, T5 and Hatton Cross would be more sustainable locations for office development. Further, there would be far greater economic opportunity in developing offices at this location given its direct access to international markets via the terminals. This can also be accommodated without compromising the need to provide land on the airport for airport related uses. The terminal sites are constrained and do not lend themselves readily to accommodate most airport related uses such as warehousing, cargo transit sheds, car rental compounds, maintenance or industrial/engineering uses.

Paragraph 2.22 sets out what is considered to be the most sustainable approach to the location of office development, and that only airport related uses should be located on airport land. Other uses, including offices, should be located on the airport perimeter. We do not agree that this is the most sustainable solution, as the airport perimeter is clearly less accessible than the airport locations and would lead to a greater reliance on private vehicles as the primary means of transport for office workers.

This approach to office development is also not consistent with the London Plan Policy 4.2 where it seeks to locate office development at viable locations with good access to public transport.

Heathrow Airport should be included as a sustainable location for office development. HAL would be willing to accept a requirement within the policy which states that before airport land is released for non-airport related offices, it must be demonstrated that no other airport use can be accommodated on the site.

Yes

We consider this policy will negatively effect the future development management of the airport

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible) If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DME5

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME5 seeks to locate hotel development in areas specified in Policy E2 of Part 1 of the Local Plan, namely Uxbridge, Hayes, Heathrow Perimeter and 'other sustainable locations'. We consider that the transport interchanges located at the CTA, Terminal 5 and Terminal 4 should be acknowledged as meeting the criteria of 'other sustainable locations' given the high public transport accessibility and

the ability to receive hotel guests direct from terminals without the need for onward travel, such as would be required for the locations listed in Policy E2.

Without this reference to the terminal locations, the policy is contrary to London Plan Policy 4.5 in regarding London's visitor infrastructure where it states that hotel accommodation outside the Central Activities Zone should be located in opportunity and intensification areas (which include Heathrow) and where there is good public transport access to central London and international and national transport termini.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In the first instance, 'other sustainable locations' should be clarified to include locations at key public transport interchanges.

As with Policy DME3 in relation to offices, HAL would accept a requirement for a sequential test to ensure no airport related use could be delivered at the site of a proposed on-airport hotel development. This approach has in fact been tested with the approval of the hotel development at Terminal 4 (planning reference: 67622/APP/2013/2532) where it was demonstrated by HAL that the site was not required for an airport use and a terminal linked hotel would in fact be the most sustainable use.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this policy will negatively effect the future development management of the airport

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB12

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Part xi) of Policy DMHB12 requires that high buildings should comply with aviation and navigation requirements. HAL supports this inclusion and recommends that developers are advised to contact HAL when considering proposals for large structures in the vicinity of the airport.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of

No

the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB16

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMHB16 seeks that all major development shall aim to incorporate living walls and roofs. We regard this policy to be inappropriate for development at Heathrow Airport due to the potential for this design solution to increase in the risk of bird strike. The Civil Aviation Authority document CAP 772 provides advice on the management of bird strike risk at airports and is clear in stating that landscaping proposals at airports should avoid creating opportunities for birds to feed, nest or roost. Living walls and roofs may provide habitats for insects on which birds feed and opportunities for roosting. We therefore consider that major developments at airports should be exempt from this policy.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The addition of a sentence in Policy DMHB16 to state that where living walls and roofs are not feasible due to the attraction of birds which can create hazards for the safe operation of the airport, other methods of sustainable design and construction will be considered.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this policy will negatively effect the future development management of the airport

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMEI4, DMEI5, DMEI6

Paragraph number

2.33, 8.49

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policies DMEI4 to DMEI6 reflect the NPPF presumption against inappropriate development in the Green Belt, green chains and green edge locations. With these policies in place, coupled with the strength of adopted and tested national policy on Green Belt development, we do not consider that the risk of Green Belt encroachment is an adequate reason to prevent non-airport related development on airport land, specifically when this is promoted in sustainable locations highly accessible by public transport.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The references to airport development encroaching on the Green Belt due to non-airport uses on airport land should be removed. In particular, paragraph 2.33 implies that hotel uses on airport land may lead to airport related uses off airport which may in turn lead to encroachment on the Green Belt. Similarly, paragraph 8.49 should be reworded to remove reference to the point that non-airport related uses located within the airport boundary have the ability to put pressure on the Green Belt.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMEI11

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMEI11 in relation to water management requires that new developments provide 'at source' SUDS measures and achieve a greenfield runoff rate plus 30%. HAL have been in discussions with the Borough's Flood and Water Management Officer who indicated a potential Heathrow specific water management policy or an agreed framework that could be applied to each airport related development. The reason for such a policy was due to the unique circumstances of Heathrow water management systems and the regime of environmental permitting through the

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Environment Agency. Heathrow is committed to reducing surface water runoff from its land however the conventional approach to water management may not be feasible.

The expectations of the policy are also unclear in terms of the requirement to 'demonstrate an integrated approach to surface water runoff'. The policy needs to be more specific in terms of its expectations so that the development requirements are fully understood. Similarly, no definition of greenfield run off rate is provided in the policy. This needs to be clearly set out within the policy.

Yes

We consider this policy will negatively effect the future development management of the airport

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMEI12

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMEI12 seeks to set water quality targets when assessing post-development implementation of SUDS. Heathrow supports effective water quality improvement measures but does not see how this policy can be applied to Heathrow given the nature of the drainage and pollution control infrastructure across the airport. Further, we do not consider that such a policy should be applied to Heathrow considering that all of the Airport's surface water flows are regulated and licenced by the Environment Agency.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Reference should be made within the policy or supporting text that Heathrow's drainage and pollution control systems are licenced under the Environment Agency and that individual development proposals on airport are subject to separate controls.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this policy will negatively effect the future development management of the airport

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMEI18

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

 Sound Prepared in accordance with the duty to cooperate, legal and procedural requirements? It has not been positively prepared It is not effective It is not justified It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

HAL supports Policy DMEI18 insofar as it seeks air quality neutral development proposals. However, we question the wording of the second sentence which suggests that new development proposals in areas exceeding EU limit values will be required to demonstrate reductions in emissions to meet those values. This requirement could not realistically be imposed upon individual development proposals given the externalities involved with air quality emissions. For example, a development proposal on a busy road could not be responsible for reducing emission levels to below EU limits as it does not have control over all road users.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The second sentence of the policy requires rewording to require that development proposals within areas of exceedence should aim to achieve air quality improvements over the baseline situation or at the very least aim to be air quality neutral.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this policy will negatively effect the future development management of the airport

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2

Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMAV1

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

 Sound Prepared in accordance with the duty to cooperate, legal and procedural requirements? It has not been positively prepared It is not effective It is not justified It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as

Policy DMAV1 seeks to ensure that sensitive uses such as housing, education or hospitals are not located in areas significantly affected by aircraft noise. HAL supports this

precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

approach but suggests it should go further to specifically set out development requirements in each noise contour.

The policy should specify that planning permission will be refused for all noise sensitive development (namely residential, nursing/care homes, schools/educational establishments, hospitals/healthcare facilities) within the 69dBA Leq contour. Between the 69 and 63dBA Leq contours there should be a restriction on residential development that avoids family accommodation being provided. Other smaller one bed and studio accommodation should only be accepted with high levels of sound insulation/ventilation. There should be a presumption against non-residential noise sensitive development as mentioned above in this zone given that the Aviation Policy Framework states that noise exposure up to this level requires insulation to be provided for existing buildings, so it seems reasonable to avoid putting new community facilities in these noise exposure areas, unless there is an overwhelming case to override this general presumption against new development. Between 63 and 57dBA LAeq contours all new built development, including residential extensions, should have high levels of sound attenuation and ventilation.

We also suggest the inclusion of the following text:

"The use of cranes for construction purposes can create operational issues for Heathrow Airport through their potential impact on Navigational Aids and radars along with the potential infringement of the Obstacle Limitation Surfaces (OLS).

"Therefore, should a crane be required on, or in the vicinity of, an aerodrome the attention of the Crane Operator should be brought to the British Standard Institute of practice for the safe use of Cranes, BS7121: Part 1." Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this policy will negatively effect the future development management of the airport

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMAV2

Paragraph number

8.45, 8.49

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to

Statistics

comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The statistics used at paragraph 8.45 relate to 2010 figures and are therefore out of date. For the calendar year 2013, 72.3 million passengers travelled through Heathrow and for the financial year ending March 2014, Heathrow handled 470,263 Air Traffic Movements.

Air Quality

We challenge the assertion at paragraph 8.45 that states:

"The airport is a major source of all three pollutants (NO_x, PM₁₀ and PM_{2.5}) making up between 36% and 54% of total emissions from within Hillingdon."

In the first instance, this is a vague assertion that does not apply specific figures to any individual pollutant levels. This is therefore an inappropriate statement to claim in a policy document.

Secondly, the statement refers to emissions, when in reference to air quality it should be referring to air pollution levels. It is air pollution levels that are important in terms of policy formulation and the protection of human health rather than the emission levels. For example, if all emissions levels from Heathrow Airport are taken into account, then this would include aircraft emissions up to 3,000ft which have a negligible impact upon air quality at ground level. Therefore, it would seem that the larger figures are quoted to imply that the airport is a larger contributor to air pollution than is actually the case.

Airport related uses

Paragraph 8.49 relates to the location of airport and non-airport related uses with respect to airport land. There are a number of statements within this paragraph that we challenge.

It is stated that development related to the airport has been controlled to locate within the airport boundary and not outside. This statement cannot be correct as there are no planning controls to enforce the future tenants of a development. For example, there is no reason why an airport related user cannot occupy a B1, B2 or B8 unit which has an extant planning consent whether that unit is located within or outside the airport boundary.

The paragraph goes on to state that unrelated development that occurs on airport has the potential to create pressure on the Green Belt and contribute to congestion. We have set out why the Green Belt reason should not apply and are content that the Green Belt policies proposed in this document and supported in the NPPF, are sufficient to control Green Belt encroachment. In terms of congestion, we see no reason why the approach taken in the proposed policy on freight, DMT7, should not also be applied to airport related uses in the area surrounding the airport. That is, proposals are required to demonstrate that they are conveniently located to allow easy access to the strategic road network.

Therefore, for the reason set out above, HAL is opposed to Policy DMAV2 on Heathrow Airport. It is contrary to the NPPF where at paragraphs 30 and 34 it advises local planning authorities to support a pattern of development that supports sustainable modes of transport when preparing Local Plans, particularly where sustainable transport modes have the potential to be maximised. The policy also runs against paragraph 33 of the NPPF where it states that when planning for airports, plans should take account of their growth and role in serving business and leisure needs.

It is also contrary to London Plan Policies 4.2 and 4.5 regarding the location of office and hotel developments respectively, as has been set out in other representations to the Plan

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The statistics provided at paragraph 8.45 require updating. HAL are happy to provide this information.

It would seem more relevant to refer to air quality levels rather than emissions at paragraph 8.45. This is more relevant that emissions levels.

Reference at paragraph 8.49 should be removed as there is no current evidence to support the assertions made. Conversely, there are many examples worldwide of the success of 'Airport City' developments which locate non-airport use on airport land which bring sustainability benefits and regional prosperity. Such example include Frankfurt, Schiphol, Chicago O'Hare, Dubai, Hong Kong, Paris Charles de Gaulle and Singapore. The same concept has also been accepted and is being developed at Manchester Airport.

HAL would be receptive to a policy which states that non-airport related uses will be permitted at sustainable locations with good accessibility to public transport where it can be demonstrated that land uses are not required for airport related uses.

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider this policy will negatively effect the future development management of the airport

Attachments

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Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?


















Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

Click here to add additional detail if you so wish.

Notes:

- Key:
-  Pedestrian Walkway
 -  Existing Vegetation to be retained
 -  Existing Vegetation to be removed
 -  Semi-Mature Native Trees
 -  Semi-Mature Pyrus Chanticleer Trees
 -  Specimen Semi-Mature Shrubs
 -  Groundcover Planting
 -  Existing Grass Areas to be retained
 -  Grass to general planting area
 -  Collector drain
 -  Main carrier drain
 -  Existing 1.8m high chain link fence to be retained
 -  1.8m high chain link fence to match existing
 -  1.8m high close boarded timber fence
 -  Pedestrian Walkway
 -  Double Arm Lighting Column
 -  Single Arm Lighting Column

3.0	24.02.06	Issued for Comment	NO	BW	RM
2.0	07.12.05	Issued for Comment	KNC	BW	RM
Ver	Date	Comments	Dtm	Chk	App

Key plan



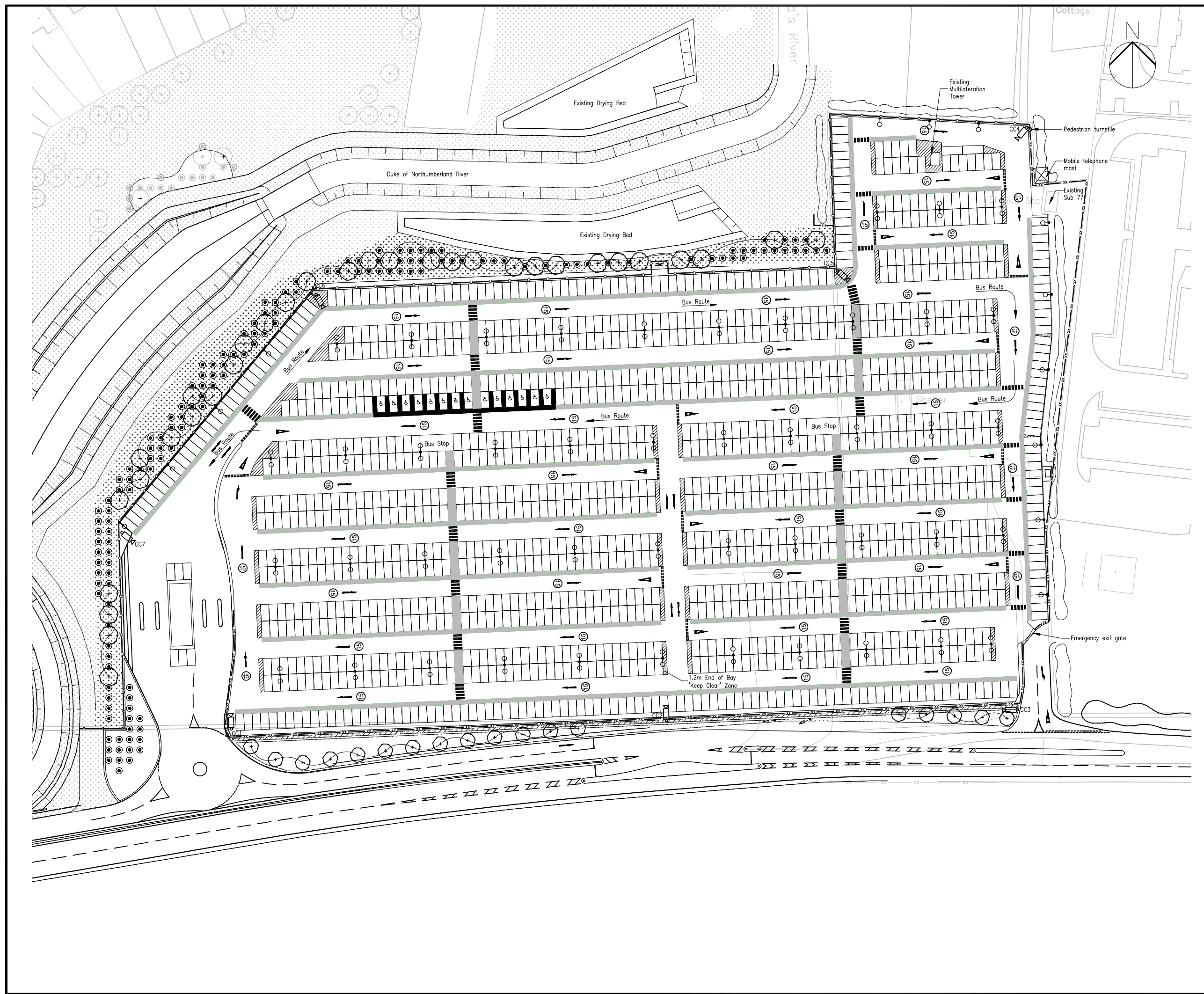
38 - Northside Parking

Approved By	Approved Date	Checked by	Checked Date	Drawn By	Date Drawn
RM	07/12/05	BW	07/12/05	KNC	07/12/05

**N3 Car Park Extension
General Arrangement**

Scale	Status
1:500 @ A1	R2

T5-DL-LF-38-05X
LC-3000003 | Version 3.0



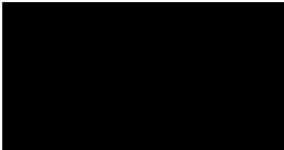
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Nothing selected
 First name
 Last name
 Address c/o Agent
 Postcode
 Telephone, including area code
 Email
 Organisation (if relevant) London Diocesan Fund

Agent's name and address (if applicable)

Title Mrs
 First name Jane
 Last name Barnett
 Address 
 Postcode
 Telephone, including area code
 Email
 Company Savills (UK) Ltd

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number DMCI1
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.) Please see attached

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible) Please see attached

If your representation is seeking a change, do you consider it necessary to participate in the oral part of No

the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) Hillingdon Representations Final Issue 04.11.14.pdf

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



4th November 2014



Planning Department,
Civic Centre,
High Street,
Uxbridge, Middlesex
UB8 1UW

Jane Barnett



BY EMAIL: planning@hillingdon.gov.uk

Dear Sirs,

Representations to the Hillingdon Local Plan: Part 2

Please find enclosed formal planning representations prepared and submitted by Savills on behalf of the London Diocesan Fund (LDF) in response to the Hillingdon Local Plan Part 2.

We have submitted these representations by both post and email, and we would be grateful if you could confirm receipt of these documents. We would also appreciate if you could notify us in future of any future consultations or publications.

In the meantime, should you require any additional information or have any further queries, please do not hesitate to contact my colleague Pearce Gunne-Jones at [REDACTED] (DD: [REDACTED]) or myself.

Yours sincerely,



Jane Barnett
Director
Savills Planning and Regeneration

cc. Jo Love, London Diocesan Fund

This representation has been prepared against **Policy DMCI1 – Retention of Existing Community, Sport and Education Facilities** of Hillingdon's Local Plan Part 2.

According to the NPPF (paragraph 182), where Local Plans are being examined they should be considered sound where they meet the following criteria:

1. Positively prepared – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*

2. Justified – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*

3. Effective – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*

4. Consistent with national policy – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*

It is considered that this draft policy is unsound due to the following.

Firstly, where there is a demonstration that there is no requirement for a building in continued community use because of the condition or location of that building for example then that should be a test in itself to justify the loss of it. This should be one of the tests actually cited in the draft policy.

Further, the draft policy is considered unduly onerous and restrictive where as currently worded any loss of an existing community facility must *'not lead to a shortfall in provision for the specific use within the local catchment' and 'there is either no demand for another suitable social infrastructure use on site, or that the site/premises is no longer appropriate for social infrastructure.'* These criteria are mutually exclusive and the requirement to meet both of these criteria is unduly restrictive.

If there is no shortfall created from the loss of the community facility then as a consequence there should be no demand. It is the view that if one of the tests set out in draft policy is met in satisfying the loss of an existing community facility then that is sufficient and balanced with the NPPF needs to deliver high quality, carefully designed housing on such sites where a community facility is no longer required or that importantly it can be relocated to another more suitable site as part of a land swap.

On this basis the policy is considered unsound and should be amended as follows:

Policy DMCI1: Retention of Existing Community, Sport and Education Facilities

Proposals involving the loss of an existing community, sport or educational facility will be permitted if:

a) the specific use is no longer required on site ~~In such circumstances, the applicant must provide evidence demonstrating that~~ by virtue that the site/premises is no longer appropriate for social infrastructure uses OR

b) the proposal would not lead to a shortfall in provision for the specific use within the local catchment;
OR

c) there is either no demand for another suitable social infrastructure use on site, ~~or that the site/premises is no longer appropriate for social infrastructure uses;~~ **OR**

d) any replacement/relocated facilities for the specific use provide a level of accessibility and standard of provision at least equal to that of the existing facility.

~~ii) the activities carried on are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents,~~

~~iii) the redevelopment of the site would secure an over-riding public benefit.~~

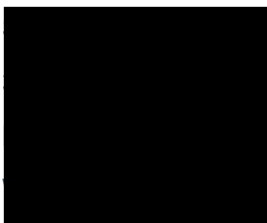
October 2014

Local Plan: Part 2

Site Allocations and Designations

(September 2014)

Prepared by Savills UK on behalf of the London Diocesan Fund



Introduction

1. These representations have been prepared and submitted by Savills on behalf of the London Diocesan Fund (LDF) in response to the Local Plan: Part 2 Site Allocations and Designations published September 2014.
2. The LDF is the administrative wing of the Diocese of London which covers 277 square miles of Greater London including the Cities of London and Westminster and 17 other local authorities. The LDF has a portfolio of freehold and leasehold property interests including office, residential and ecclesiastical properties. The LDF strategically considers development and change of use potential of suitable properties within its portfolio in order to generate receipts or revenue for reinvestment back into the operation of the Church.
3. In response to this consultation document, this submission seeks to include the following site in the Site Allocations and Designations document:
 - Ladygate Lane, Ruislip
4. This submission also seeks a Green Belt deletion for another site under LDF ownership for a land use swap with Ladygate Lane:
 - Glovers Grove
5. In summary, this submission seeks inclusion of the LDF's site at Ladygate Lane, Ruislip within the Site Allocations and Designations document as a residential development opportunity and deletion of the green belt site at Glovers Grove.

Planning Considerations

a) Site at Ladygate Lane

Development Plan Certainty

1. Part (3) (5) (a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 indicates that Local Development Documents should 1) include the development and use of land which the local planning authority wish to encourage during the specified period and 2) include the allocation of sites for a particular type of development or use – with the purpose of site allocations in a plan to guide the determination of applications for planning permission.
2. NPPF (157) indicates that plans should plan positively for development in the area to meet the objectives, principles and policies of the Framework. It states that sites should be allocated to promote development bringing forward new land where necessary and providing detail on form, scale, access and quantum of development where appropriate.
3. The Presumption in Favour of Sustainable Development (PFSD) is the “*golden thread*” which runs through a plan. The approach to a plan, its vision and proposals should be expressed in policies which are justified and effective in accordance with the NPPF. The plan needs to be positively prepared.
4. The NPPF sets out the Government’s current and future requirements for boosting significantly the supply of housing (in the drive for economic growth) - including the identification of a supply of specific, developable sites sufficient to provide five years worth of housing against local housing requirements.
5. NPPF (7) indicates priority towards “*providing the supply of housing required to meet the needs of present and future generations*” and “*widening the choice of high quality homes*” (NPPF (9)). There are various references to housing needs throughout the document. Importantly, though, NPPF (159) indicates that SHMAs should cater for housing demand, as well as need.
6. It is clear from national statute and planning guidelines that plans should allocate even the smaller sites to create certainty on their 5 year land supply. It is understood from our discussions with officers that the Authority will consider representations below the 0.25 hectare threshold and take a view on whether the site is suitable for allocation based on the issues and site specifics which we address below.

7. The Fund are considering options at the moment for a carefully designed housing scheme at the Ruislip site and linked to this proposal, relocation of the existing scout hut to a more suitable location at Glovers Grove. This facility is also intended to be used during the day as a nursery and the Fund are currently in discussion with an interested operator. As a result, this linked proposal would not result in any net loss of a community facility. The housing development at the Ruislip site would enable development of the new, better located facility at Glovers Grove. The Fund is in the process of preparing pre application documentation for discussion with Officers during the coming weeks with the intention to submit two linked applications on the above basis.

Overall Housing Position

8. As cited in the Site Allocations and Designations document, *'the borough's current target is to provide an additional 4,250 dwellings, annualised as 425 dwellings per year, for the ten year period between 2011 and 2021'*. The Draft Further Alterations to the London Plan (FALP) however, proposes an increased annualised target of 559 for the borough.
9. An assessment of the annual monitoring report shows that the majority of the residential dwellings are coming from strategic sites which, by their very nature, go beyond the 5 year period. Furthermore, as noted on page 15 of the Site Allocations Document, *'a key component of the Hillingdon's London Plan housing monitoring target is an allowance for small sites under 0.25 hectares.'* According to the detailed housing trajectory outlined in the Annual Monitoring Report, between 2013 and 2018 the number of small scale unidentified windfalls with planning permission or under construction ranges from 68 to 70. This number will have to increase to accommodate the increased FALP target. The site put forward in this submission therefore, whilst small in scale, would make an important contribution to the borough's housing target and assist in addressing the shortfall.

Site Specific considerations

Land Use

10. The area around the site is predominantly residential in nature. The proposed site allocation is therefore considered appropriate in this context. Through pre-application consultation with the council, the LDF is looking into a land use swap for the existing community use, to re-provide the Scout Hut at a nearby site at Glovers Grove, which is also under LDF ownership. The principle of this land swap would therefore provide the opportunity to create a new and enhanced scout hut facility in place of the existing facility which is supported by the Scout organisation. This arrangement would lead to no net loss of the existing community facility on

the site. This space would also be shared with a nursery in use during the daytime with an interested operator already identified.

Density

11. Based on the PTAL rating of 1B, the density range for a residential development on the site is between 150-250 habitable rooms per hectare (hr/ha). The proposed scheme for 5 to 8, family-sized residential dwellings on the site is in accordance with this density range.

Housing Mix

12. An analysis of the area immediately surrounding the site demonstrates that this location is considered a mixed character area, with semi-detached houses on the site's western elevation, and flats on the site's eastern elevation. The prospective design for a residential scheme for the site, subject to planning consent, would be for up to 8 family sized residential dwellings, thus making an important contribution to family housing provision in the borough and importantly meeting market demand within this locality.

Design Approach

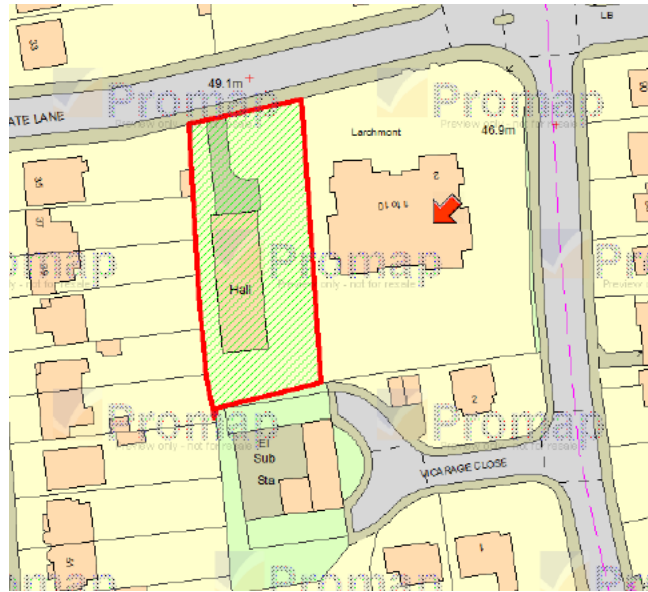
13. The site is brownfield land and benefits from an existing access onto Ladygate Lane and services. The prospective design for a residential development on the site has been developed to create high quality family dwellings, with outdoor amenity space and off street parking provision, in accordance with London Plan design standards. The configuration of the development has been orientated to ensure sufficient distances with the adjacent properties, to ensure privacy and outlook is maintained. Design options will be explored in detail with Officers at the time of the pre-application consultation.

Conclusions

14. Based on the above considerations, we would propose insertion of the following matrix to the Site Allocations and Designations document:

Ladygate Lane, Ruislip, HA4 7QR

The site has an area of 0.12 hectares and is located on the south side of Ladygate Lane. It is a plot with vehicular access from Ladygate Lane. The existing Scout Hut comprises a single storey building located in the south west corner of the site. The rear of the site abuts Vicarage Close.



Ladygate Lane, Ruislip, HA4 7QR

The Council supports the development of the site for residential use. This will meet the following criteria:

- The existing protected trees on the site will be retained;
- Through discussion with the council, the landowner is prepared to consider a land swap with a site adjacent to Glovers Grove under the same ownership to relocate the existing Scout Hut, thus ensuring that there will be no net loss to the community facility;
- A residential development on the site will make a contribution of family sized dwellings with off street parking and private amenity space and assist in meeting the housing targets for this local area of the borough.

Site Information

Site name	Ladygate Lane
Location	Ruislip
Area (ha/sqm)	0.12 hectares/ 1,228 sqm

PTAL Ratings	1B
Proposed Development	Residential
Designations	Site is located within an Archaeological Priority Area
Existing Use	Premises used by the Scouts organisation
Relevant Planning History (Most Recent)	Planning permission 702A/73/259 dated 07/05/73 was granted for the erection of a Scout Headquarters.
Proposed Number of Units	5-8 family sized dwellings.
Existing Units	0
Net Completions	0
Infrastructure Considerations	No specific considerations
Indicative Phasing	Short term.
Other Information	None

b) Site at Glovers Grove

15. This submission seeks to delete the green belt designation of another LDF site at Glovers Grove, Ruislip. Deletion is justified on the grounds that the site would offer a land swap opportunity to re-provide the existing scout facility currently located at a site known as Ladygate Lane (proposed as a housing allocation) to enable sustainable residential development at this location. This is in accordance with the Inspector's report on Part 1 of the Local Plan which notes that *'very minor adjustments and compensatory additions could take place at this stage, perhaps to make viability and achievable a sustainable development.'*
16. When assessed against paragraph 80 of the NPPF, the site is not considered to strategically contribute towards the purposes of the Green Belt, as outlined below:
- Check the unrestricted sprawl of large built-up areas;
- The site is a small part of a much larger green belt site, and thus would not check the unrestricted sprawl of large built-up areas.*
- Prevent neighbouring towns merging into one another;

The site's location on the edge of the existing settlement will not prevent neighbouring towns merging into one another.

- Assist in safeguarding the countryside from encroachment; or

The site's small size and proximity to the existing settlement means that it does little to assist in safeguarding the countryside from encroachment.

- Preserve the setting and special character of an historic town.

This is not considered applicable to this site.

17. Further, a single storey development in the form of a replacement scout facility is considered justified in principle based on the very special circumstances of need and likely minimal impact on the openness of the GB at this location.

18. We would therefore propose insertion of the following Green Belt deletion into the Site Allocations and Designations document:



4) Grovers Grove, Ruislip

Recommendation:

Delete from the Green Belt

Reason for Recommendation: The site does not merit its current Green Belt designation and should be deleted from the policies map as Green Belt. It is adjacent to the existing settlement boundary, and the proposed development for a single storey community facility on the site in connection with a land swap opportunity at Ladygate Lane, would have limited impact on the openness of the Green Belt. The site is bounded by properties on two sides and due to its limited size is considered not to positively contribute towards the NPPF's tests to include land in the Green Belt , namely:

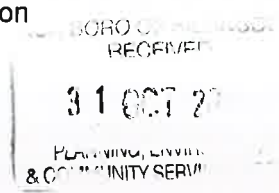
- Check the unrestricted sprawl of large built-up areas;
- Prevent neighbouring towns merging into one another;
- Assist in safeguarding the countryside from encroachment.

ID 58

GREATER LONDON AUTHORITY
Development, Enterprise and Environment

James Gleave
Planning Policy Manager
London Borough of Hillingdon
3N/02
Civic Centre
High Street
Uxbridge UB8 1UW

Our ref: D&P/LDF14/LDD18/EK
Your ref: JT.lp-007.Sep14
Date: 29 October 2014



Scanned.
31 OCT 2014

Dear Mr Gleave

Hillingdon Council Publication of the Local Plan Part 2:

- **Development Management Policies**
- **Site Allocations and Designations**
- **Policies Map**

Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a)

Thank you for your letter of 18 September 2014 consulting the Mayor on the above documents and requesting an opinion on general conformity. The Mayor has delegated authority to me to respond. As you will be aware, all development plan documents must be in general conformity with the London Plan under section 24 (1) (b) of the Planning and Compulsory Purchase Act 2004.

It is the Mayor's opinion that the Proposed Submission version of the Local Plan Part 2 is in general conformity with the London Plan. However, some strategic issues remain and these are set out below with other representations to clarify or improve policy. Representations from Transport for London are attached in Appendix 1 and form part of the Mayor's response.

Development Management Policies

- **Reducing Carbon Emissions**

The following change is suggested to Policy DMEI2 to ensure the emphasis is on developments that genuinely cannot meet the targets onsite in accordance with London Plan Policy 5.2, as opposed to the Council approving the development for other policy reasons and discounting the carbon targets (new text in *red italics* deleted text ~~struck through~~).

Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, *where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and* if the Council is minded to approve the application despite not meeting the carbon reduction targets, then it will seek an offsite contribution to make up for the shortfall.'



Site Allocations and Designations

- **Housing**

The council's housing targets referenced in section 3 (Identifying sites for new homes) is from Policy H1 of the Local Plan Part 1 adopted in in 2012. The referenced annualised target of 425 dwellings is in accordance with the current London Plan. However, the Further Alterations to the London Plan (FALP) sets a new higher minimum housing target of 5,593 for the period 2015-2025 with an annual monitoring target of 559 dwellings. The council will need to review Part 1 of its Local Plan following adoption of the FALP to develop a new housing target in accordance with FALP Policy 3.3.

- **Green Belt, MOL and Green Chains**

To clarify the council's proposed changes to the designation of Green Belt, Metropolitan Open Land and Green Chains the council should set out in a table for each designation the hectares to be lost, hectares to be gained, net change, and the net change as a percentage of total land designated.

- **Rebalancing Employment Land**

Policy SEA1 Strategic Industrial Locations and the defined boundaries for the SILs are supported in line with Policy 2.17.

The designation of Hayes Industrial Area as SIL (PIL) is supported. However, for clarity it is suggested that paragraph 4.11 is reworded as follows (changes in *red italic*):

4.11 Prologis Park makes an important contribution to the Heathrow logistics market and as such has been designated as a *strategically significant industrial location as part of the Hayes Industrial Area*.

The wording in paragraph 4.13 refers to mixed use sites along the canal frontage (which comprise about half of this designated area). This wording creates ambiguity in the status of this location as SIL. The Local Plan should be clear whether the location is being designated as SIL (where mixed use residential development is not appropriate) or not.

With regard to Uxbridge Industrial Estate (SIL) no objection is raised to the de-designation of the Cape Boards site which it is noted has remained vacant for a substantial period of time.

The designation of Stonefield Way, South Ruislip as SIL is supported. The GLA notes that its character is more typical of the Industrial Business Park definition rather than a Preferred Industrial Location. The GLA will give further consideration to this matter in a future review of the London Plan.

The designation of North Uxbridge Industrial Area as SIL is supported.

No conformity issues are raised by the designation of locally significant employment sites and industrial sites in line with London Plan policy 4.4 and paragraph 4.12 (with respect to Stockley Park).

APPENDIX 1:

Hillingdon Local Plan Part 2 – Transport for London

The following comments assess the Local Plan against the currently adopted London Plan - Revised Early Minor Alterations to the London Plan (REMA) and also highlight where the Local Plan diverges from the Further Alteration to the London Plan

- **DMT1 and Table 8.1**

The minimum thresholds included for Travel Plans need to be updated to reflect the current TfL guidance available from: <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans/planning-requirements>.

- **DMT5 and Appendix A Table 1**

Policy DMT5 includes cycle parking standards for multiple land uses including retail, residential units and office. These are all stated as maximum requirements and should all be amended to minimum requirements to ensure conformity with REMA and FALP.

The B1 office cycle parking standard does not correspond to those contained within the revised early minor alterations to the London Plan (REMA) (1 space per 150 square metres for staff and visitors). The draft FALP also requires 1 space per 150 square metres for long stay cycle parking and additional provision for short stay cycle parking. The draft FALP states in a footnote to table 6.3 that cycle parking standards in town centres that have high PTALs such as Uxbridge should have cycle parking standards that match inner/central London.

The residential cycle parking standard is in accordance with REMA but does not meet the revised standards put forward at the FALP EIP which require a minimum of 1 space per studio and 1 bed unit and 2 spaces for all other dwellings.

TfL requests that Policy DMT5 promotes the Legible London walking scheme as an initiative to assist in providing well signposted pedestrian and cycle routes.

- **DMT6 and Appendix A Table 1**

The maximum standards for car parking are not in accordance with REMA or draft FALP maximum standards. For residential units Policy DMT6 proposes 2 spaces per 3 bed unit, and 1-1.5 spaces per 1 and 2 bed unit, compared to the REMA standard of 1-1.5 spaces and less than 1 per unit respectively. In the draft FALP these are expressed as up to 1.5 per unit for 3 bed dwellings and 0-1 per unit for 1-2 bed dwellings. Maximum car parking standards should be read in the context of London Plan policies as a whole. This will allow for local flexibility taking into account accessibility; type, mix and use of development; public transport and local car ownership. The London Plan states that a balance is to be struck between promoting new development and preventing car parking provision that can undermine cycling, walking and public transport use. This flexibility is emphasised further as London's diversity is recognised and a flexible approach to identifying appropriate levels of car parking provision is identified. The draft FALP also includes a density matrix which provides an indicative shading to emphasise the flexibility in the London Plan's parking standards. These can be used to establish the parameters for a broader appraisal of local circumstances.



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	
First name	
Last Name	
Organisation (if relevant)	Nestle
Unit	House number
House name	C/O AGENT
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	MR
First name	PETER
Last name	ALCOCK
Company	ALPS GROUP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA10
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

PLEASE REFER TO THE ENCLOSED LETTER OF REPRESENTATION

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

PLEASE REFER TO THE ENCLOSED LETTER OF REPRESENTATION

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

PLEASE REFER TO THE ENCLOSED LETTER OF REPRESENTATION

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

PLEASE REFER TO THE ENCLOSED LETTER OF REPRESENTATION

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
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Returning your form

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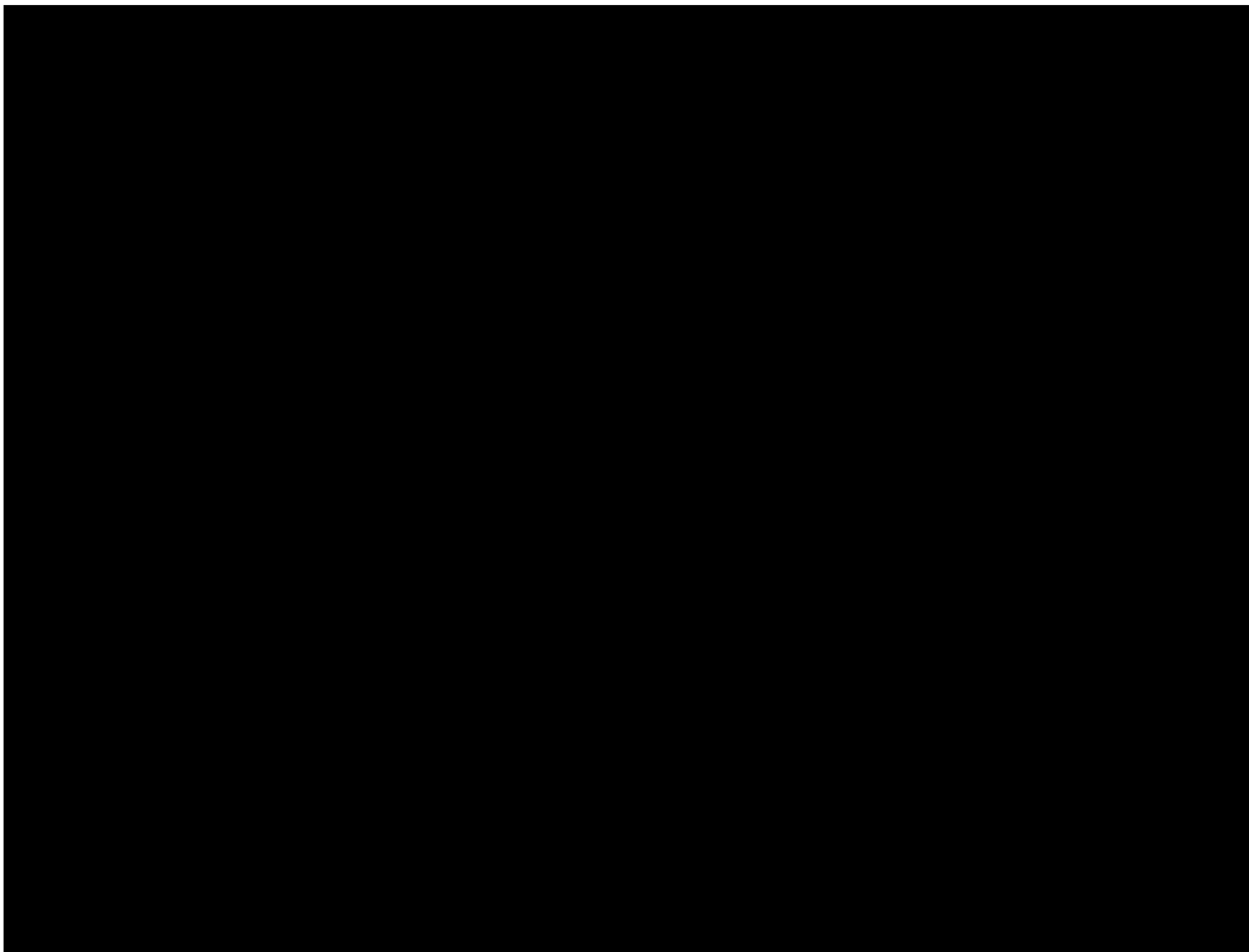
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Monitoring Questions

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Our Ref: PJA/JH

Your Ref:

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

04 November 2014

Dear Sir/ Madam

SITE ALLOCATIONS POLICY SA10 – LAND TO THE SOUTH OF THE RAILWAY, INCLUDING THE NESTLÉ SITE, NESTLÉ AVENUE, HAYES

We write as Agent to Nestlé, the Landowner, who support the identification of land at Nestlé Avenue for development in the Site Allocations Development Plan Document (DPD) (Policy SA 10, 'Site A') for mixed residential and employment led purposes. However, they have a number of concerns in respect of specific details of the policy and on this basis, wish to register an objection. On the basis that the plan proceeds to examination, they would, as the Landowner, wish to address the Inspector and attend the relevant hearing sessions.

Background:

In 2012, Nestlé announced the planned closure of the Hayes Plant and the transfer of the whole of its UK coffee operation, including manufacturing, filling and packing, to Tutbury in Derbyshire, where it is building a new manufacturing facility to provide the flexibility in production that the UK requires. This has taken place in a phased manner and production will cease at the end of 2014. The Plant roughly corresponds to Site A as identified under Policy SA10. The intention is for the site to be sold for development.

It is anticipated that the Site will be available for development in 2015. Assuming a 24 month process to secure implementable planning permission (i.e. all conditions precedent discharged), development would commence in 2017.

Alps Group Limited

Objections:

Extent of Site A: The proposed division between Sites A and B is inaccurate.

The Plan should reflect the land interest as per the enclosed plan.

Comprehensiveness:

The draft policy seeks a comprehensive development scheme. Whilst we accept that the development of Site A should not fetter or impinge upon the development potential of Site B as identified in the plan, we understand that Site B is not available for development at present. Site B is occupied by a variety of smaller scale units, the subject of a variety of land interests.

The plan should not seek to delay the beneficial redevelopment of Site A.

Residential Capacity:

The plan should seek to optimise the residential capacity of the Site, having regard to other plan objectives and policies and our comments below.

The accessibility of the Site will substantially improve with the opening of Crossrail. Under the current PTAL rating of 1b to 3, as an urban location, this site would generate up to 170 units per hectare. With Crossrail, if PTAL were to increase to 2 to 4, as was the case for the Old Vinyl Factory site (application reference 59872/APP/2012/1838), this would generate up to 260 units per hectare (London Plan 2011 Density Matrix Table 3.2). Accordingly, rather than specify an area of land that should be set aside for residential development or a maximum dwelling yield, we suggest that the final quantum of new homes and area of land to deliver it should be determined through the iteration of the development proposals.

The policy should express the dwelling yield as a target and range, subject to detailed scheme design.

Extent of Employment Land:

Any specific requirement for employment land at this stage is arbitrary. Suitable uses should include B1, B2 (where compatible with the residential elements of the scheme) and B8 storage and distribution uses.

The Plan should not specify a minimum site area for employment but seek the comprehensive development to include the provision of viable employment generating uses that meet the need and demand of the market in a manner consistent and compatible with comprehensive development of the wider Site.

Open Space and Sports Pitch:

The Site falls within the Botwell/Nestlé's Conservation Area. At present, the Site provides for a central area of open space leading from the main gate and a treed boundary. Through scheme iteration, the effect of

the proposals upon the character and appearance of the conservation area will be tested and the role of green space will be an important consideration.

There would not appear to be an evidenced need for a sports pitch and such provision would be incompatible with the wider development aspirations. The Plan should delete reference to the need for a sports pitch. The form, extent and character of green space or green infrastructure should be determined through the detailed iteration of the scheme.

Education:

The requirement for education use is unclear and is not justified by the evidence base. We understand that there may be demand and merit in the provision of a nursery or similar provision as opposed to primary or secondary school provision.

The Plan should be clear as to the aspirations of the Council in terms of social and community uses such as a day nursery which should be determined through the evidence base to the plan.

Consistency with Policies in other Parts of the Plan:

This requirement is unnecessary. S38 of the Act requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise.

There is no need or justification to deviate from this statutory requirement.

Yours faithfully

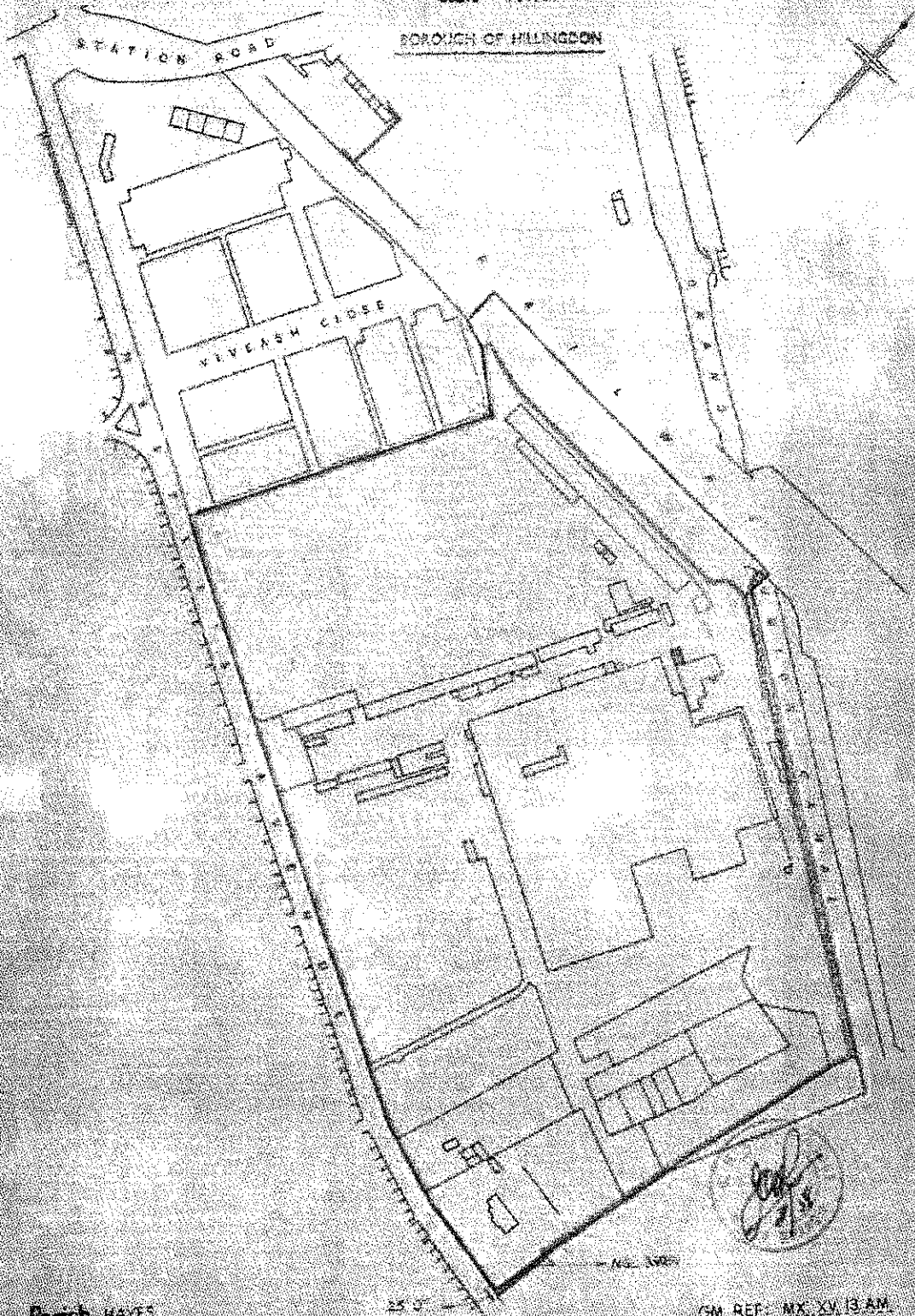


Peter Alcock
Alps Group Limited

GREATER LONDON **H.M. LAND REGISTRY**

Scale 1/2500.

BOROUGH OF HILLINGDON



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File No. **MX348720**

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PLAN 1



HILLINGDON

LONDON

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1. Name and Address		2. Agent's Name and Address (if applicable)	
Title		Title	MR
First name		First name	PETER
Last Name		Last name	ALCOCK
Organisation (if relevant)	Nestle	Company	ALPS GROUP
Unit	House number	Unit	
House name	C/O AGENT	House name	
Address 1		Address 1	
Address 2		Address 2	
Town		Town	
County		County	
Postcode		Postcode	
Telephone		Telephone	
Email		Email	

PART B - Your responses:

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(please tick relevant box)

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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME1, DMH2, DMH7, DMHB5, DMHB6, DMHB18, DMHB19, DMHB20, DMHB21, DMEI1, DMEI3, DMEI8, DMC14, DMC15, DMC18, DMT6
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

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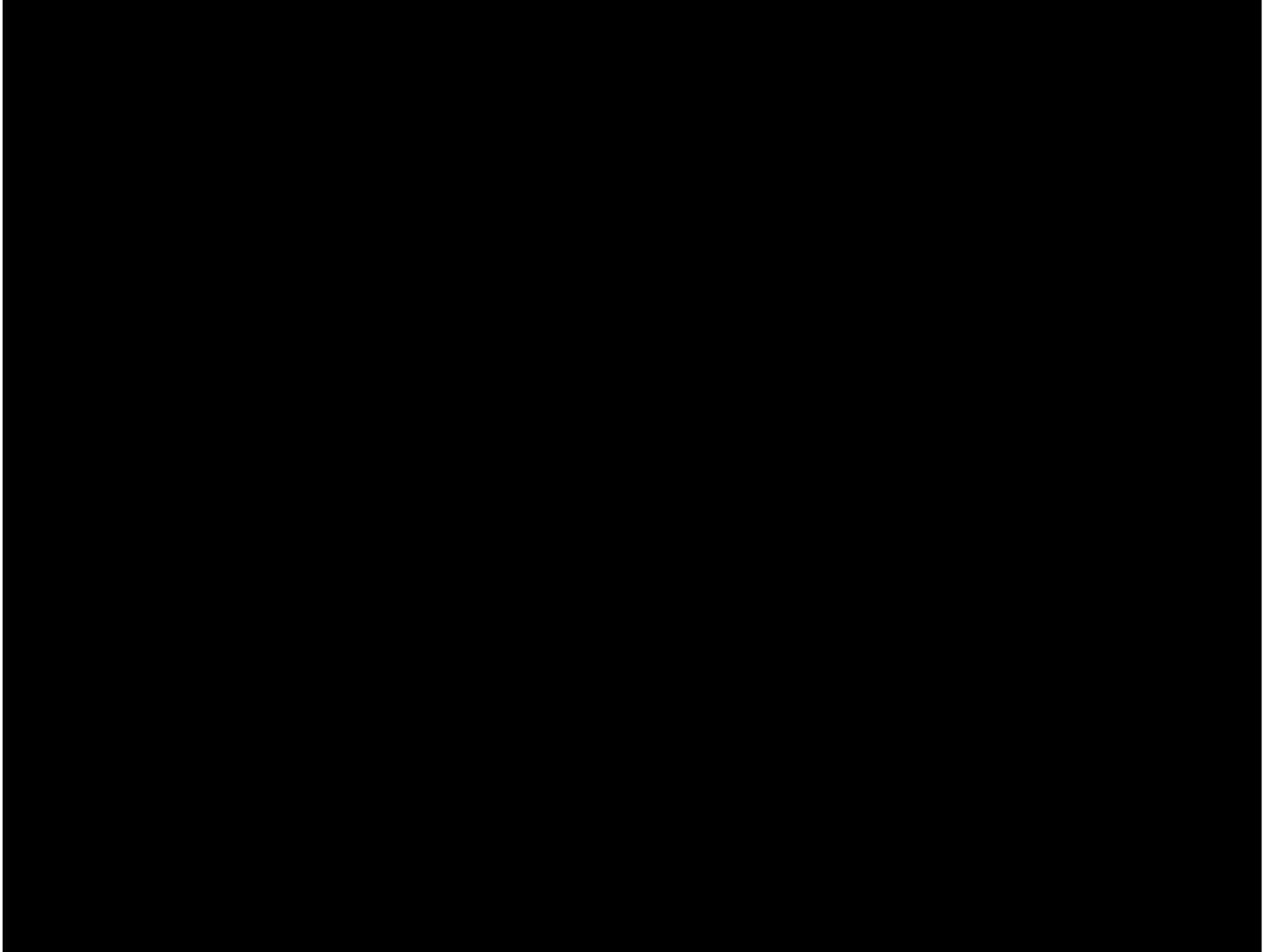
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Our Ref: PJA/JH

Your Ref:

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

04 November 2014

Dear Sir/ Madam

**LOCAL PLAN: PART 2 DEVELOPMENT MANAGEMENT POLICIES PROPOSED
SUBMISSION VERSION**

We write on behalf of the landowner, Nestle, in relation to the London Borough of Hillingdon's (LB Hillingdon) Development Management Policies Proposed Submission Version. There are a number of matters that we wish to raise relating to the Proposed Submission Version, relating to:

1. Policy DME1: Employment Uses in Designated Employment Sites;
2. Policy DMH2 Housing Mix;
3. Policy DMH7 Provision of Affordable Housing;
4. Policy DMHB5: Locally Listed Buildings;
5. Policy DMHB6: Conservation Areas;
6. Policy DMHB18: Housing Standards;
7. Policy DMHB19: Private Outdoor Amenity Space;
8. Policy DMHB20: Residential Density;
9. Policy DMHB21: Play Space;
10. Policy DMEI1: Sustainable Design Standards;

Alps Group Limited

11. Policy DMEI3: Decentralised Energy;
12. Policy DMEI8: Waterside Development;
13. Policy DMCI4: Open Spaces in New Development;
14. Policy DMCI5: Children's Play Areas;
15. Policy DMCI8: Planning Obligations and Community Infrastructure Levy; and
16. Policy DMT6: Vehicle Parking and Parking Standards set out in Appendix A.

National Planning Policy Framework (March 2012)

Paragraph 182 of the National Planning Policy Framework March 2012 (NPPF) identifies the 'tests' for examining local plans. Paragraph 182 also identifies that the role of the independent inspector is to assess whether a plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound.

To be considered sound, the NPPF (para 182) states that a local plan should be:

- Positively prepared;
- Justified;
- Effective; and
- Consistent with national policy.

Please find our comments set out below.

Policy DME1: Employment Uses in Designated Employment Sites

Section D of the emerging policy states that other uses will be acceptable in LSIS and LSES only where:

- There is no realistic prospect of the land being used for industrial or warehousing purposes in the future;
- Sites have been vacant and consistently marketed for a period of 2 years; and
- The proposed alternative use does not conflict with the policies and objectives of this plan.

Paragraph 22 of the NPPF seeks to avoid the long-term protection of employment sites where there is no reasonable prospect of the site being used for that purpose. Paragraph 22 encourages local planning authorities to consider alternative uses of land or buildings on their merits having regard to market signals and the need for different land uses to support sustainable local communities. Having to market a vacant site consistently for a period of 2 years is excessive and contrary to the NPPF. The second bullet point relating to marketing should therefore be removed.

Policy DMH2 Housing Mix:

The emerging policy states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need. The table in supporting paragraphs identifies the current housing types and sizes for different types of tenure. However, express reference should be made that the mix will be applied having regard to, inter alia, local circumstances and the character and nature of the site and scheme.

Policy DMH7 Provision of Affordable Housing:

We note the policy states a minimum of 35 percent of all new homes must be affordable with a tenure split of 70 percent social / affordable rent and 30 percent intermediate. The flexibility to adjust quantum and tenure to reflect site circumstances (site location and scheme characteristics as well as viability) is essential.

Policy DMHB5: Locally Listed Buildings

Policy states that extensions and alterations to locally listed buildings will be expected to preserve their local identity and character, and be of appropriate design, scale and materials.

In assessing the significance of various buildings consideration should be given to the measures contained within the NPPF – namely whether their loss would result in no harm, less than substantial harm or substantial harm (Section 12).

In determining planning applications, local planning authorities should take account of Paragraph 131 of the NPPF:

- *“The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *The desirability of new development making a positive contribution to local character and distinctiveness.”*

There are provisions within the NPPF, Paragraph 133, which facilitate a total loss or substantial harm to a heritage asset, provided the requirements of that Paragraph are met and demonstrated in full:

"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- The nature of the heritage asset prevents all reasonable uses of the site;*
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- The harm or loss is outweighed by the benefit of bringing the site back into use."*

The policy should therefore reflect that a locally listed building can be demolished where tests set out in Paragraph 133 of the NPPF can be met.

Policy DMHB6: Conservation Areas

Emerging policy states that new development within a conservation area will be expected to preserve or enhance its significance by making a positive contribution to its character and appearance. As is the case for draft policy DMHB5, policy DMHB6 should reflect Paragraph 133 of the NPPF as set out above.

Policy DMHB18: Housing Standards

Table 1: Minimum floorspace standards sets out the Council's proposed housing standards. Having assessed these standards against the Mayoral Housing Supplementary Planning Guidance (SPG) (November 2012), we note that these accord. In addition, we note that all homes must meet 'Lifetime Homes Standards', provide at least 10 percent of new housing as accessible or easily adaptable for wheelchair users and support the 'Building for Life' design principles. These proposed standards also accord with the Mayoral Housing SPG (November 2012). This policy must be flexible to take into account changes in national standards.

Policy DMHB19: Private Outdoor Amenity Space

We note that proposed private outdoor amenity space standards are set out in Table 2: Private Outdoor Amenity Space Standards. In summary, emerging standards are as follows:

- 1 bedroom house: 40 sqm;
- 2/ 3 bedroom house: 60 sqm;
- 4+ bedroom house: 100 sqm;
- Studio 1 bedroom flat: 20 sqm;
- 2 bedroom flat: 25 sqm; and
- 3+ bedrooms flat: 30 sqm.

The Mayoral Housing SPG (adopted November 2012) sets out the following planning policy in relation to amenity space provision:

"A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant."

The proposed standards significantly exceed the Mayoral Housing SPG. The LB Hillingdon Open Space Strategy 2011-2026, which comprises part of the Local Plan evidence base, states that: *"overall at a Borough wide level the amount of open space is about right"* (section 3.2.1, page 18).

Although some wards within Hillingdon have open space deficiencies, others do not.

Residential developments differ in terms of local circumstances and the character and nature of the site and scheme. To ensure housing sites can be "optimised" (London Plan Policy 3.4), whilst achieving high quality design, LB Hillingdon should seek to bring forward new developments in accordance with the Mayoral private outdoor amenity space standards as set out above.

Policy should be amended to reflect the London Plan. There are no LB Hillingdon special circumstances which warrant different standards.

Policy DMHB20: Residential Density

The NPPF highlights the importance of achieving high quality design and inclusive environments. Policy 3.4 and 3.5 of the London Plan seek residential densities that optimise the housing output of sites whilst ensuring that they are of the highest quality internally and externally.

It is important to note that residential density is a useful guide to the nature and intensity of a development but cannot be used as the only indicator of acceptability of proposals.

Whilst we note that LB Hillingdon seeks to categorise locations, the PTAL rating is key when establishing suitable densities in a location. PTAL provides flexibility and allows for future changes in local circumstances, i.e. Crossrail. The column referring to different locations should therefore be removed. Furthermore, there is no justification for a deviation from the London Plan density matrix (Table 3.2). Policy DMHB20 should therefore refer to the density matrix as set out in the London Plan.

Policy DMHB21: Play Space

We note that new residential developments which result in a significant net increase in child yield will be required to provide children and young people's play facilities, and if the full need cannot be met on site an appropriate financial contribution will be sought. We also note that emerging policy DMHB21 states that all residential developments that would increase pressures within areas of deficiency will be required to make an appropriate financial contribution. Any planning obligations will need to be assessed against the CIL regulations 2010 (as amended) which states that obligations should be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

Furthermore, this draft policy should refer to the Mayor of London's Children and Young People's Play and Informal Recreation Supplementary Planning Guidance (SPG) (2012).

Policy DMEI1: Sustainable Design Standards

Emerging policy requires developments to achieve a minimum Code for Sustainable Homes Level 4 or BREEAM Very Good. These standards accord with those set by the GLA.

Policy DMEI3: Decentralised Energy

Draft policy DMEI3 should be deleted. LB Hillingdon should not limit technical solutions to deliver sustainable design.

Policy DMEI8: Waterside Development

We note that any development located in or adjacent to watercourses should enhance the waterside environment, by demonstrating a high quality design which respects the

historic significance of the canal and character of the waterway, and provides access and improved amenity to the waterfront.

Policy DMCI4: Open Spaces in New Development

Policies referring to open space provision in new developments are repeated. Policy DMCI4 should be incorporated into emerging policy DMHB19. Any policy referring to open space provision should have regard to; inter alia, local circumstances and the character and nature of the site and scheme.

Policy DMCI5: Children's Play Areas

Emerging policies relating to children's playspace provision are repeated. Policy DMCI5 should be incorporated into policy DMHB21.

For all major development proposals, the Council seeks to apply its own child yields and the London Plan SPG entitled 'Providing for Children and Young People's Play and Informal Recreation'. In areas of deficiency, the policy states that there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.

Policy should be amended to make reference to London Plan child yield calculations. There is no justification for deviation.

Any policy referring to children's playspace provision should adopt a flexible approach. Taking into consideration the nature of the site, it may be appropriate to provide playspace on site or make a financial contribution to existing facilities in the nearby area.

New residential developments should meet the playspace requirements for the new development alone and not the existing deficit.

Policy DMCI8: Planning Obligations and Community Infrastructure

Any planning obligations will need to be assessed against the CIL regulations 2010 (as amended) which states that obligations should be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

Policy DMT6: Vehicle Parking and Parking Standards

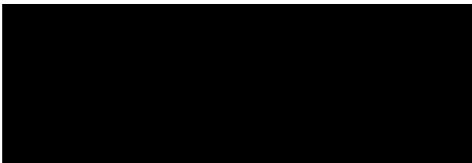
Parking standards as set out in Appendix A are:

- B1(b) (c): 1 space per 250 sqm;
- B2 –B8: 1 space per 500 sqm;
- Dwellings with curtilage: 1 space per 1 or 2 bed units and 2 spaces per 3 or more bed units;
- 3-4 or more bedroom flats: 2 spaces per unit;
- 1-2 bedroom flats: 1.5-1 space per unit;
- Studio: 1 space per 2 units.

These standards exceed those set out in the London Plan (2011). When applying car parking standards to a scheme, a range of matters should be considered including local circumstances and the character and nature of the site and scheme. Parking standards should reflect PTAL and be expressed as maximums.

We wish to reserve Nestle's right to attend the Examination in Public on the Local Plan Part 2. If you have any queries regarding our comments set out above, please do not hesitate to contact me.

Yours faithfully



Peter Alcock
Alps Group Limited

IO60



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Mrs
First name	Eileen
Last Name	Bowlit
Organisation (if relevant)	Ruislip Village Conservation Area Panel
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	
First name	
Last name	
Company	
Unit	House number
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME 4 DMHB6 DMHB7 DMHB3 DMHB4 DMHB5
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

[Empty response box for Q6]

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I might be able to supply useful historical background.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Empty response box for comments.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillington.gov.uk

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Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group

RUISLIP VILLAGE CONSERVATION AREA PANEL

COMMENTS ON HILLINGDON PLAN Stage 2

1. Generally speaking this is a well thought out plan, which should offer protection to Hillingdon's Historic Heritage, Conservation Areas and Green Spaces. The effectiveness of the plan, however, will depend upon the interpretation of its policies.

The wording of the policies is sometimes weak.

For example Policy DMHB1 'Development that has an effect on heritage assets will only be supported where....' is less robust than 'Development that has an effect upon heritage assets will not be permitted unless it sustains and enhances....'

Similar examples can be found throughout the document.

2. MANOR FARM, RUISLIP (Scheduled Ancient Monument) Policy DME4

Tourist Visitor Attraction

The Panel thinks that the whole of Manor Farm should be classed as a visitor/tourist attraction.

i The site includes:

Grimsdyke (part of), a Saxon earthwork that can be traced from Harrow Weald;

Norman motte-bailey castle site. The site at Manor Farm is the only undoubted motte-bailey in the Greater London area.

Medieval priory site;

Gt Barn (c.1300), the oldest timber-framed barn in the Greater London area;

Manor house built in 1505-07 (now an Interpretation Centre), an early example of a ceiled hall with chimney and crosswing. The house is also unusual in having a brick ground floor with a timber-framed upper storey.

Little Barn (16th century barn), now used as Manor Farm Library;

18th and 19th century farm buildings in community use, a 20th century rebuilt cowbyre serving as an Art Gallery/Exhibition Centre and café.

The site is served by public transport and has a car park.

ii. Associated visitor attractions.

St Martin's Church –pre 1086 foundation, is a 13th -15th building very close to Manor Farm at the end of Ruislip High Street. The churchyard is enclosed on two sides by timber-framed 16th century buildings.

Park Wood, a short walk across Copwell Mead, through the small piece of relict ancient woodland and up Sherwood Avenue brings the visitor to Park Wood, ancient woodland composed of oak standards and coppiced hornbeam, now managed in the traditional way.

The Park Pale (Scheduled Ancient Monument) The northern portion of the embankment that surrounded the 'park for wild animals' mentioned in Ruislip's entry in the Domesday Book, can be seen within the wood.

Ruislip Lido via Park Wood is approximately 1 mile from Manor Farm.

3. CONSERVATION AREAS DMHB6 and AREAS OF SPECIAL LOCAL CHARACTER DMBH7

The Panel applauds the spirit of the policy, saying that new buildings will be expected to make a positive contribution to the character of a Conservation Area and Areas of Special Local Character. However, our faith in its effectiveness, is dependent upon more robust enforcement of these principles.

Ruislip was developed as a Garden Suburb from 1914 onwards, with most building taking place between the two World Wars. The streets are leafy and spacious and the houses mostly two-storeyed with hipped roofs and gables proliferating. Many buildings have interesting architectural details, including several of the High Street shops. Later building - some infilling and some redevelopment of very large houses, has mainly retained the traditional styles and low-rise character of the neighbourhood. These characteristics caused the original Conservation Area around the church and Manor Farm to be extended to include Ruislip High Street and the estates on the north side; and the Croft Estate (Midcroft, Croft Gardens, North and South Drive) to be designated an area of Special Character.

4. LISTED BUILDINGS DMHB4 DMHB5

The Conservation Area contains 23 statutorily listed buildings, mostly Grade II except the Great Barn which is Grade II*, 26 locally-listed buildings and 1 scheduled ancient monument. The Panel notes the policies set in place for their protection with approval, but their effectiveness will again be dependent upon enforcement.

5. ARCHAEOLOGICAL PRIORITY AREAS DMHB3

The Panel is pleased that a large part of the Ruislip Village Conservation Area is also an Archaeological Priority Area, based on the Manor Farm site, St Martin's Church and the village centre, known from documentary evidence to have been inhabited from medieval times. We hope that the portion of the APA that was part of one of the open fields will not be dismissed as unlikely to produce anything of archaeological interest, bearing in mind the find of an Iron Age ditch during building works at Bishop Ramsey School in 2007.

6. METROPOLITAN OPEN LAND

Manor Farm The Panel welcomes the amount of open space designated as Metropolitan Open Land. Most of Manor Farm is MOL, but the courtyards on either side of the Gt Barn, the Duck Pond and St Martin's Approach car park (once Dove House Close, site of the manorial dovecot) have been excluded. The Panel would like to have these parts of Manor Farm included.

Bishop Winnington Ingram School Playing fields

Parkway Green

The Panel thinks that these two areas fulfil the criteria for designation as MOL.

7. NATURE CONSERVATION

The panel welcomes the extension of Nature Conservation areas in the Ruislip, Northwood and Eastcote area.



HILLINGDON

LONDON

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1. Name and Address	
Title	MRS
First name	SUSAN
Last Name	TOMS
Organisation (if relevant)	RUCKIP, NORTHWOOD & EASTCOTE LOCAL HISTORY SOCIETY
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

PART C - Information on the progress of the Local Plan Part 2

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PART B - Your responses:

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Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Page 120
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q6. Metropolitan open Land
Site 11 - Manor Farm

Most of the Manor Farm site has been designated MOLA, which we support, but we would suggest that the following be also included -

The courtyards on either side of the Great Barn.

The Duck Pond.

St. Martin's Approach car park (once the site of the manorial dovecote).

ID62

Representation to Local Plan
The Douay Martyrs School & land at Glebe Farm

4 November 2014
LB Hillingdon

Section	
1	Introduction
2	Site Description and Surroundings
3	Planning History and Existing Uses
4	School status and evidence
5	Alternative sites
6	Assessment of Proposed Development
7	Development Plan Planning Policy Overview + Planning Obligations
8	Green Belt Assessment
9	Conclusion
	Appendices
1	Site Plan
2	Hillingdon Primary School pupil planning data

Douay Martyrs School & Land at Glebe Farm Site Description and Surroundings

Site Description



- Redevelop main school campus
- Enhanced drop-off/pick-up
- New school link across railway
- New upper school facilities
- New community green space
- Enhanced access to Ancient Monument
- Retained and Enhanced green belt

Enabling development sites

Douay Martyrs School & Land at Glebe Farm

Planning History and Existing Uses

Site and Planning History

The two fields are some 15 acres remaining of the 1382 acre Swakeleys Estate that was auctioned off in July 1922 and represent the last part of the five lots, mainly awkward pieces of fields which were cut off by the newly built railway line, that were advertised at that time as building land.

The estates nine farms were mainly sold off in their entirety including Long Lane Farm bought by Mr Edward Dalton, and Ivy House Farm, Milton Farm, Church Farm and Glebe Farm which were purchased by West Middlesex Development Company, who had entered an agreement with Uxbridge Urban District Council in 1927, to develop the Ivy House Farm estate in accordance with the principals of a Town Planning Scheme then being prepared by the Council. Both Milton Farm and Glebe Farm continued as farms for some years, though with depleted amounts of land. By 1937 the Reverend Guy had acquired them and in 1939 the Ickenham Garden City in conjunction with the District Council was begun. The City development was halted during the war years and then completed soon thereafter on a reduced scale although the existing Milton Court and surrounding housing and roads illustrate the innovative and modern style of housing development then completed in conjunction with the Uxbridge District Council. In addition, it is noteworthy that the 'existing large green open space' of Milton Court was donated by his brother Mr Waldo Guy to the Ickenham residents as a 'free open community space' for the relaxation and enjoyment of the residents.

The farm land that was not used due to the 'austerity measures of the 2nd World War' for the Ickenham Garden City were then placed into Trust and the remaining parcels of all that land are these fields owned by Guys Investments Limited under Trust ownership for the surviving family beneficiaries of the late Reverend Guy and his brother.

In the late 1940's plans were drawn up for a major housing estate in Ickenham to the east of the railway line replete with houses, schools, cinema and shops. Both Burnham Avenue and the Glebe Primary School were built at this time and some of the land became part of the Middlesex Green Belt. In the 1950's houses were still being built in Clovelly Close and Clovelly Avenue, which was the site of Glebe Farm. Indeed Clovelly Avenue terminates abruptly at the site boundary. The public highway, associated footpaths and utilities and services are all terminated in anticipation of further residential development southwards into the Glebe Farm fields. The Glebe Farm 'home' grazing fields are the fields associated with this Representation on behalf of the three parties.

At the time of the Borough of Hillingdon's Unitary Development Plan – draft 1993 representation was made by the Trustees to permit a relaxation of the Green Belt status to accommodate a re-development of the Douay Martyrs School in order that the school could expand and cater for the rising number of children within the school's catchment area. The Trust in conjunction with the School head – Lady Stubbs - presented to the Inquiry and whilst the Inspector both commended and supported the re-development scheme he was unable to 'rule' on the submission as it fell outside the specific remit of the inquiry.

Previous plans for fields

During the period of the Unitary Plan's development the school applied for temporary classrooms which was deferred, and the Trust itself received an offer to purchase the 'Fields' for use as an educational expansion and re-siting of the Douay Martyrs School on a single site by the Hillingdon Council itself. In the years following the Trust

Douay Martyrs School & Land at Glebe Farm School Status and Evidence

This section of the representation is seeking to address the well-known challenge across London in terms of Pupil Place Planning.

Demographic Influences

The 2014 secondary school admissions cohort commenced compulsory schooling in September 2007. Since that date there have been two significant developments effecting access to education:

- The rapid expansion in the primary sector that has been required in order to supply sufficient school places for primary school aged children (evidence included in Appendix 2)
- Changes within the European Union that have resulted in a significant increase in number of Catholic Families choosing to settle in the United Kingdom

During the last 5 years, the number of places in Catholic primary Schools in Hillingdon has remained unchanged at 330. However, within the authorities listed above, more than 300 places per year (10 forms of entry) have been supplied in areas that are close to the borders of Hillingdon. This will result in greater demand for places at those named schools. With most governing bodies using distance as the determining factor for managing oversubscription, the net results is that the catchment area for each secondary school will reduce. The impact for Hillingdon and Hillingdon Catholics in particular will be significant.

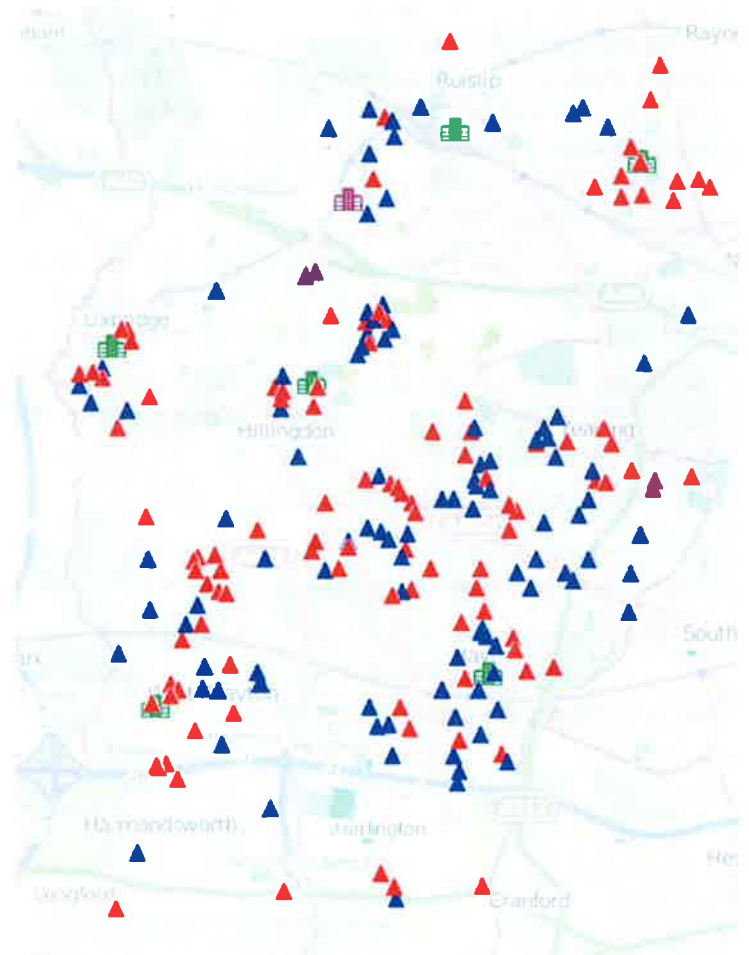
Douay Martyrs is the only maintained Catholic Secondary school/academy operating within the LB Hillingdon. Situated in just north of the A40 in Edinburgh Drive, Ickenham, it attracts most of its pupils from within the Borough. On the map to the right, Douay Martyrs is represented by the maroon building symbol situated to the north-west of RAF Northholt. The six green building symbols represent the 6 Catholic Primary Schools in Hillingdon. The red triangles represent Catholic pupils and the blue triangles, non-Catholic pupils.

It is clear from the evidence depicted, that the vast majority of successful applicants to Douay Martyrs come from within the Borough of Hillingdon.

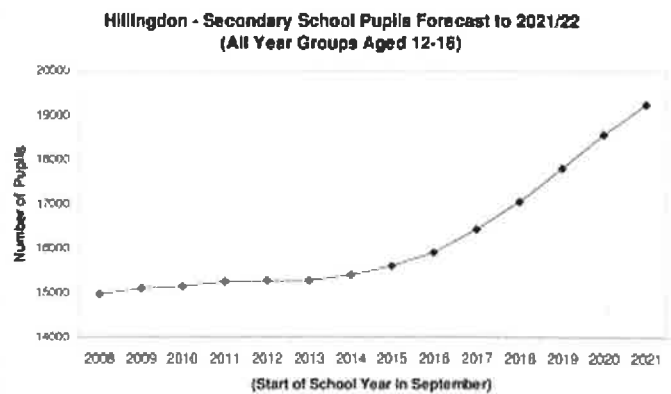
In September 2014, Douay Martyrs admitted: the following student profile:

Catholic Pupils:	126
Non-Catholic Pupils:	114
Total:	240

The planned admission number for Douay Martyrs is 240, therefore the school is full.



- Predictions from the Greater London Authority indicate the number of secondary pupils in Hillingdon is set to increase by 25% (an extra 3,900 pupils) to more than 19,000 between September 2012 and 2021/22. The rate of increase is faster for year 7 pupils (the entry year into secondary schools) as the growth in primary pupils moves into secondary education. This is consistent with the increase in primary pupil numbers and similarly is concentrated in the south/south-east of the Borough (the main catchment area within Hillingdon for The Douay Martyrs School). In the medium-term there are



sufficient secondary school places however, the pressure for secondary school places is expected to begin from the year 2016/17 onwards and will lead to a need to provide an additional 16 forms of entry for secondary school places in the Borough. Which given planning and building timeframes of circa 4 academic years for a large secondary school, suggests actions needs to be taken now;

- Since the update to Cabinet in April 2013 officers have been in discussion with the Head Teachers of secondary schools in the Borough to establish what their plans are for developing their school and to undertake an outline appraisal of existing school sites to assess the potential for expanding the provision of school places. Officers have been exploring opportunities to expand existing secondary schools in the first instance given the significant land required for a typical six form of entry secondary school to meet prescribed school standards e.g. space for playing fields. Typically the size of site required for a school of this size is approximately six hectares – please refer to site search conducted by stakeholders on section on alternative sites;
- All of these localised ‘Hillingdon factors’ are compounded by the popularity of Catholic schools, with immigrant parents from Eastern Europe and the ripple out from now significantly oversubscribed, redeveloped catholic schools such as Cardinal Wiseman in Ealing.

All of the above points to an overwhelming need to assess the full merits of each and every proposal to build capacity, particularly at well established, well regarded schools. That is even before we address how will this programme be financed. Our proposal aims to be at zero cost to the public purse, an approach that LB Hillingdon itself welcomes and can embrace:

“The current Primary Schools Expansion programme factors in £63.6 million of DFE grant and £16.7 million of S106 resources. The balance of £69.4 million is being resourced from a combination of borrowing and capital receipts from disposals of council assets. Further increase in a Council led build programme for further schools expansion would require a significant increase in borrowing with associated revenue cost implications. Therefore a strategy that looks at partnership would potentially mitigate the further impact on council resources.”

“Pursuant to section 14 of the Education Act 1996 the Council has a statutory duty to ensure that sufficient school places are available in its area for providing primary, secondary and special education. Further, by virtue of Section 1 of the Localism Act 2011 that makes provision for ‘a general power of competence’ for local authorities in England. The ‘power’ gives local authorities the power to do anything an individual can do unless specifically prohibited by law. This includes the power to act in the interest of their communities.”

to identify and secure a suitable site within 1 mile of the current school. Furthermore, public transportation must be equal to or better than those servicing the existing site. Cycling options must also be viable.

Outcome: The preferred solution subject to available site against criteria outlined below

The Site Selection Process

In view of the above, a sequential assessment has been carried out that identifies sites within and close to the area of greatest need, of sufficient size to accommodate the new school and reasonably available to the Council (as the body with responsibility to purchase land for educational purposes).

The site search sought to identify suitable sites in planning terms, but also taking into consideration educational requirements, for the provision of a new ten-form of entry secondary school within the Hillingdon area. Essentially, the primary criteria in selecting sites suitable for the new school were to identify: sites of a sufficient size; sites which would allow the greatest numbers of staff and students to walk, cycle or use public transport to get to the school, rather than car; sites which were reasonably available within the time and budgets available to the Council; and sites which were most appropriate from a planning perspective.

Taking into consideration the geographical area within which the new school is required, and following a review of the adopted and emerging Local Plans, discussions with Council Officers, a desk based assessment and an 'on the ground' analysis of potential locations, only two sites have been identified, where there could be potential to provide a school. Once identified these sites were assessed against a basic set of criteria, including the following (in no particular order of importance):

- i. Location
- ii. Size and physical constraints
- iii. Accessibility
- iv. UDP designations
- v. Availability

i. Location

The location of the school site is an important factor to not only ensure that it appropriately serves the area of greatest need but to also ensure the long-term success of the school. In determining the location, sustainability has been an important consideration. Schools are major generators of traffic and, as such, it is vital that they are located so as to maximise their accessibility by walking, cycling and public transport. This has been a significant factor in determining the appropriateness of sites. Notwithstanding the above, there are a number of factors that can influence the location of the site and it is important that a balance is struck between all relevant criteria.

ii. Size

The size of the site is a critical factor in determining its suitability for a secondary school. The Education (School Premises) Regulations 1999 - enshrined in Guidance BB98 and updated in BB103 (secondary) - sets out specific requirements for school premises. A school to accommodate circa 2,000 pupils (ten form of entry plus 100% staying on rate in sixth form) would require the following allowances – demonstrated against the current arrangements:

Building	Current	BB98	BB103 (S)
Pupil numbers	1,680	2,100	2,100
Total net building area	9,040	11,170	10,473
Total gross building area	11,752	15,920	15,230
efficiency - footprint	tbc	6,368	6,092

The two sites that emerged were:

1) Former Master Brewer - Hillingdon Circus site

This site emerged as a credible alternative for a school when assessed against criteria i. through to iii., albeit LB Hillingdon acknowledges in its own assessment of this site that a significant objection was the impact a current application would both have on traffic and pollution. The area is an Air Quality Management Area that means with even current traffic levels it's already exceeding the pollution quotas for the European Union. Further concerns were raised about: " The longer it takes people to cross a road the more likely they are to ignore the traffic light system and cross when they see a chance, not when the light turns green. That could be very dangerous - especially for young children."

In terms of criteria iv., its designation is 'Land designated for other use' and unfortunately LB Hillingdon has recently resolved to grant permission for a mixed use Retail, Hotel and Residential development. This recent approval hence negates criteria v. from being an influencing factor as the owner is developing out.

2) The Douay Martyrs School own site in conjunction with adjoining land at Glebe Farm

This site emerges as the most credible alternative and only real viable option as it scored very favourably on criteria i. through to iii. On criteria v., it also scored heavily as the landowner has positively been supporting any school development scheme for the past 20 years and is happy to implement immediately, post the appropriate statutory approvals being in place. As indicated by the preference on standings the significantly larger portion of the school would be on existing designated (D1) non-residential institution land. The smaller proportion of the school will be on the Green Belt designated land at Glebe Farm. Notwithstanding this statutory obstacle, the benefits of creating a single site Douay Martyrs campus including their playing fields have outstanding education possibilities.

The stakeholders resolved to endorse the Douay Martyrs School own site in conjunction with adjoining land at Glebe Farm option as their favoured solution and approach LB Hillingdon and the community as appropriate. It was further determined that elements of enabling development should be considered in order to provide a 'zero cost to the public purse' solution as well as significantly reducing the land cost to the Diocese or Academy itself.

Douay Martyrs School & Land at Glebe Farm

Green Belt Assessment

Within this section, we assess the component parts of the proposed development alongside Green Belt (GB) policy contained within local, regional and national planning policy.

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007) (UDP)

UDP policy OL1 defines the types of development considered acceptable within the Green Belt. These are predominantly open land uses including agriculture, horticulture, forestry, nature conservation, open-air recreational activities and cemeteries. It states that planning permission will not be granted for new buildings or changes of use of existing land or buildings that do not fall within these uses.

Policy OL2 states that, where development proposals are acceptable within the Green Belt, in accordance with Policy OL1, the Local Planning Authority will seek comprehensive landscaping improvements to enhance the visual amenity of the Green Belt.

Local Development Framework

The London Borough of Hillingdon is currently in the process of preparing its Local Development Framework. The Core Strategy was submitted to the Secretary of State in October 2011 and an Examination in Public commenced in March 2012. Accordingly significant weight can now be attached to this document, given its advanced stage in the planning process.

Policy EM2 confirms that any proposals for development within the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

Notwithstanding this, paragraph 8.27 states that "in very exceptional circumstances the Council will consider the release of Greenfield sites for schools."

Regional Policy Guidance - The London Plan (July 2011)

London Plan policy 7.16 reaffirms that the "strongest protection" should be given to London's Green Belt, in accordance with national guidance, and emphasises that inappropriate development should be refused, except in very special circumstances.

National Policy Guidance - National Planning Policy Framework (NPPF)

The NPPF makes it clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It states that:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."

In the GB there is a presumption against inappropriate development. Paragraph 3.4 of PPG2 clarifies that the construction of new buildings in the GB is inappropriate unless it is for certain purposes defined by that paragraph. Based upon this, the buildings that are associated with certain uses are considered an appropriate form of

As indicated previously, this proposal seeks to safeguard that part of the site (southern portion) that enhances the overall open countryside character in this area, extending the public access to 'around the moats' of the Ickenham Manor, and seeking linkage to the Austin's Lane Trail thence through to the River Pinn public access areas.

Openness – in terms of policy, openness is governed by:

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007) (UPD) Policy R4 seeks the protection of open space stating:

"The Local Planning Authority will not normally grant planning permission for proposals which involve the loss of land used (or where the last authorised use was) for recreational open space (including publicly accessible open space and playing fields, private or school playing fields, private or public allotments), particularly if there is (or would be) a local deficiency in accessible open space."

Local Development Framework Policy EM4 of the Core Strategy states that the Council will "safeguard, enhance and extend the network of open spaces" and that "there will be a presumption against any net loss of open space in the Borough." Development proposals should address local deficiencies.

Regional Policy Guidance - The London Plan (July 2011) London Plan policy 7.16 reaffirms that inappropriate development within London's Metropolitan Open Spaces should be refused except in very special circumstances:

"The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable in they maintain the openness of MOL."

Policy 7.18 reiterates that the loss of open spaces must be resisted. Where the loss of open space is proposed it should be replaced by equivalent or better quality space within the locality and that the replacement of one type of open space with another will not normally be considered acceptable.

National Planning Policy Framework (NPPF) Paragraph 74 of the NPPF reaffirms that the strongest protection should be given to preserving open space:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

As indicated, this representation seeks to establish debate around what the community wants for this space. It is currently only accessible at the benevolence of the landowner and tenant. The loss resulting from the proposed development would be replaced by:

- equivalent or better provision in terms of quantity and quality in a suitable location;
- the development is for alternative sports & recreational provision and greater public access, the needs for which clearly outweigh the loss.

Openness is a distinctly separate test to visual impact in that it relates to the amount of built form as opposed to whether you can see it. To assist in further assessment an analysis of the site and its surrounding landscape context will be undertaken and a number of visualisations prepared from locations agreed with the local planning authority.

Effect on Landscape Character More Generally

Mindful of all the above, it is necessary to consider how 'character' in the landscape context is understood and the effects of the development upon it. Character is about more than what can be seen: it is a function of land use and

Regional Policy Guidance - The London Plan (July 2011) London Plan policy 3.18 states:

"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of primary school places will be particularly encouraged."

National Policy Guidance - DCLG Policy Statement on Planning for Schools Development (published 15/08/11)

The DCLG policy statement on planning for schools development is designed to facilitate the delivery and expansion of state-funded schools. It states:

"The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - educate the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards."

It goes on to say that:

"It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes."

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities should make full use of their planning powers to support state-funded schools applications."

National Planning Policy Framework (NPPF)

Paragraph 72 of the NPPF reiterates the objectives set out in the DCLG Policy Statement on Planning for Schools Development. It clearly confirms that the Government attaches great importance to ensuring that a sufficient choice of schools places is available.

with the capacity to admit 270 pupils per year (9 forms of entry) just to cope with the projected displacement caused by one Catholic Secondary School.

Educational Attainment – Ofsted have repeatedly indicated that the ability of Douay Martyrs to deliver an outstanding education is significantly compromised by their current facilities, principally the impact of being a split site. Ofsted quoted 'The school's buildings are on two sites separated by a busy main road; this affects punctuality to lessons as well as presenting difficulties for the school and the students.'

Safety – There have been long publicised and debated issues due to the split site nature of the school on either side of Long Lane – there has been one fatality through the current arrangements despite additional crossing controls. This scheme aims to address this by creating one single site linked by bridge across the London Underground railway. Furthermore, this will free the front portion of current main campus to provide a proper school drop-off + pick up facility easing congestion along Long Lane during peak periods.

Basic Conditions – The Douay Martyrs School current accommodation only has an assessed agreed capacity for 216 pupils per year; they currently accept 240 pupils on an interim basis. As policy now dictates an increased staying on rate post-16, this creates greater pressure. Combine this with the DfE policy to not capital fund split site schools and the school is left in very difficult situation - note: this scheme aims to create a one site school that is then eligible for DfE capital funds. This scenario is further exacerbated over the next 5 years as major fabric and services condition items (heating, roofing) become critical and potentially elements that may lead to school closure(s) should they fail to be instigated in due time.

Alternative sites – redevelopment/expansion; relocation in and out of the borough

Redevelopment and expansion on the existing site: This is not a realistic option. The twin sites of the existing school are already over developed. Whilst an expansion of the school on its existing sites is theoretically possible, LB Hillingdon would have to:

- vi. Consent to buildings of significant height (5 to 8 stories) in an area that comprises of mainly residential housing;
- vii. fund the demolition and rebuild of the whole school; and
- viii. arrange for the school to be accommodated in temporary facilities for the 24 – 30 months required to complete the work

Relocation to a site outside of Hillingdon: This is not a realistic option. Whilst it might be possible to find a potential site for the school outside of the Borough, if relocated, it could not continue to serve its current communities and feeder primary schools. In reality, the school would fill with Catholic children but these children would be from the area immediately surrounding the new site. The supply of places for Catholic residents of Hillingdon would be significantly reduced, severely limiting the options of a significant portion of the electorate.

Relocation within LB Hillingdon: Based in Ickenham, Douay Martyrs is reasonably accessible to Catholic residents throughout the Borough. The original siting of Catholic Secondary Schools, by the Diocese of Westminster, was planned to ensure that every school had a strong catchment area whilst offering parents a certain amount of choice. If the school is to be relocated within the Borough, it is necessary to identify and secure a suitable site within 1 mile of the current school. Furthermore, public transportation must be equal to or better than those servicing the existing site. On this principal basis, a detailed analysis has been undertaken in order to identify the most appropriate site for such a school, taking into consideration key criteria including size, location, accessibility, UDP designations and availability. All possible alternatives (all identified Sites in the Local Plan -Part1), and particularly those in more appropriately designated locations, have been carefully scrutinised in making the site choice. The one alternative location of any merit was the Hillingdon Circus site, however LB Hillingdon recently gave consent for this site for retail and residential uses. Hence, all alternatives were not deemed suitable for a range of reasons and were thus rejected.

Summary

Taking into consideration the site's Green Belt location a scheme has initially been and will continue to be carefully developed which seeks to not only meet relevant Department for Education requirements and best practice guidance regarding educational delivery, but to also minimise its impact on the openness of the surrounding area and to enhance the visual and leisure amenities of the locality where possible. Naturally any elements of the scheme's design will blend appropriately into its wider setting and will not detract unnecessarily from the visual amenities of the surrounding area. Design elements such as high levels of sustainable building measures will be a necessity not a nicety.

It is considered that the educational need and the lack of more appropriate alternative site options for the provision of the school, combined with the proposed low impact design, high quality landscaping scheme and incorporation of high levels of sustainable build measures, amounts to a case of very special circumstances sufficient to justify the loss of some open space and the provision of the school in this Green Belt location.

We respectfully request LB Hillingdon's support for the principles of the project outlined. This would then allow The Douay Martyrs School, the Diocese of Westminster and Trustees controlling Guys Investment Limited to engage with all stakeholders to develop a community solution meeting the needs and aspirations of all.

Appendix 2

Primary School Trends

Hillingdon is served by 6 Catholic Primary schools. Together they offer 330 places per year as indicated on the table below. In recent years, the percentage of Catholic Children has been increasing year on year. In 2014, the percentage of Catholic Children starting school in reception exceeded 91% of the total intake..

With Catholic admissions being the top priority, this then affects the probability of Non-Catholic children being offered a place. In 2014 more than 450 Non-Catholic children expresses an interest in a place in one of the 6 Hillingdon Catholic Primary Schools. Only 29 applications were successful and the majority of these were for the younger siblings of Non-Catholic children already attending a Catholic School. The success rate for Non-Catholic applicants is less than 7%.

	Region of Hillingdon	Number of Pupils Admitted to Reception Each Year
Botwell House	Hayes	90
St Bernadette	Hillingdon	60
Sacred Heart	Ruislip	90
St Catherine	West Drayton	30
St Mary	Uxbridge	30
St Swithun Wells	South Ruislip	30
Total		330

RLG/Ih/1020/61/1

03 November 2014

Planning Policy Team
London Borough of Hillingdon
3N Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

Dear Sir/Madam

**RE: HILLINGDON LOCAL PLAN PART 2 REGULATION 19 PROPOSED SUBMISSION
VERSION REPRESENTATIONS ON BEHALF OF CEDARWOOD ASSET MANAGEMENT
IN RELATION TO VENTURIS PARK, DAWLEY ROAD, HAYES, UB3 1HH**

We act on behalf of Cedarwood Asset Management and write in respect of your current consultation. We request that the contents of this letter, setting out our representations on behalf of our client are taken into account as part of the current consultation. The demise of our clients' interests at Venturis Park are detailed on the attached red line plan (ref: RA_SLP01).

Background

Our client's site is situated within a primarily industrial area, located on Dawley Road, about 1km to the west of Hayes town centre. The site extends to approximately 2.6 hectares in size and, although cleared, formally comprised two buildings in light industrial, research, development and office use. The buildings were formally occupied by EMI.

Planning permission for redevelopment of the site was granted in 2005. The description of the consented development is:

"The redevelopment of the site to provide Class B1(b) & B1(c) (Business) & B8 (Storage and Distribution) uses including some trade counter uses with associated parking, servicing, access and landscaping".

An application to extend this permission was submitted in April 2010, and subsequently granted on 30 March 2012. As a result of a standard time limiting condition attached to the renewed consent, it can be implemented up to 29 March 2015 (subject to discharge of all pre-commencement conditions and obligations).



The above permission, which comprises a mix of light industrial, warehousing and trade counter uses with a range of unit sizes, remains unimplemented. Due to the relative age of the consent and changing market demands the client intends to submit a revised planning application, albeit broadly comprising the same mix of uses.

In light of the above, the site represents a prominent site within an existing industrial area with considerable development opportunity. Thus in order to ensure that development can be realised and to support sufficient supply of industrial land within the borough it is key that policy adequately promotes and supports development on this site.

Representations on Local Plan Part 2

It is understood that the Local Plan Part 2 comprises three documents, a development management policies document, a site allocations document and a proposals map, released for consultation, and we comment on the relevant documents as follows:

Proposals Map and Site Allocations Document

The site is confirmed as within the boundary of a Strategic Industrial Location named “Hayes Industrial Area”. The protection of the site as a main reservoir of industrial land is supported. Within these locations, general industrial, light industrial, storage and distribution, and other industrial related uses are acceptable in principle. However, it is considered to complement these uses that an element of trade counter uses, within the site, should also be supported by the Council in policy DME1 part A.

Development Management Policies

In accordance with Planning Practice Guidance, with regard to the production and deliverability of Local Plans (March 2014), plans should be “aspirational but also realistic”. Therefore, it is considered that development sites should not be subject to policy burdens which unnecessarily threaten or restrict the realisation of development opportunities.

In light of the above it is considered that the following amendments should be made:

- **Policy DMEI8 (Waterside Development)** - We consider that the policy should be amended to confirm that each case should be “taken on its own merit”.
- **Policy DMEI11 (Sustainable Urban Drainage Systems)** – Again the policy should be amended to confirm that each case should be “taken on its own merit”.
- **Policy DMEI1 (Sustainability)** – We consider that it should be an “aspiration” rather than a “requirement” for a minimum of BREEAM “very good”, in order to allow for cases to be considered on their own merits.
- **Policy DMHB16 (Living Walls and Roofs)** – It is considered that that “reasonable justification” as to why proposals cannot incorporate living walls, and living roofs onto “all parts of the available roof space”, should include measures of “practicality and viability”.



Summary

In summary, we feel that the Local Plan Part 2 is broadly sound, subject to a number of key amendments. We support the Council's recognition of Venturis Park within a Strategic Industrial Location, albeit consider that an element of trade counter use should also be acceptable on the site (Policy DME1). In addition, we consider Policies DME18, DME111, DME11 and DMHB16 should be amended to provide a policy framework, which does not unnecessarily place a barrier to economic development.

We therefore trust that the Council considers our representations in full and relative to those objections, and that this will be reflected in the next stage of the Local Plan Part 2. In addition, we request that we are notified of progress of the document and participation in the Examination hearings.

In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise. Please send all correspondence marked for the attention of Rebecca Gunn at our London office.

Yours faithfully

Rapleys LLP



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	
First name	
Last Name	
Organisation (if relevant)	Cedarwood Asset Management
Unit	House number
House name	
Address 1	c/o Agent
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	Miss
First name	Rebecca
Last name	Gunn
Company	Rapleys LLP
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME18
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please refer to accompanying letter for full representation.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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(please tick relevant box)

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<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI11
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
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<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI1
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Empty response box for providing details of why the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please refer to accompanying letter for full representation.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

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N/A

Please continue on a separate sheet if necessary

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Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB16
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please refer to accompanying letter for full representation.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME1
Paragraph Number; or	
Table or Figure Number; or	Map 1.1 - Overview Map
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please refer to accompanying letter for full representation.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To ensure that matters raised are fully explored and discussed at examination hearings.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
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SITE LOCATION PLAN
 Dawley Road,
 HAYES, UB3 1HH.



Scale @ A3 : 1:1250

Plan No. : RA_SLPO1



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Canal &
River Trust

Keeping people, nature & history connected

4 November 2014

London Borough of Hillingdon
3N/02
Civic Centre
High Street
Uxbridge
UB8 1UW

Dear LDF Team,

Re: Public Consultation for draft Hillingdon Local Plan Part 2

Thank you for your consultation in respect of the above. Please note that although the Canal and River Trust forms a part of the Hillingdon Canals Partnership please consider this letter to be the Trust's formal response to your consultation.

The British Waterways Board (Transfer of Functions) Order 2012 has substituted references to British Waterways in the Town and Country Planning (Development Management Procedure) (England) Order 2010 to the Canal & River Trust. As such, local planning authorities are now required to consult the Canal & River Trust on applications for planning permission in the same way as British Waterways was previously consulted. In addition, under the British Waterways Board Transfer Scheme 2012 (also made under the Public Bodies Act 2011) all the property of British Waterways in England and Wales has now vested in the Trust.

The Canal & River Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.

The Trust has a range of charitable objectives including:

- To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;
- To protect and conserve objects and buildings of heritage interest;
- To further the conservation, protection and improvement of the natural environment of inland waterways; and
- To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

We work extensively with private, public and voluntary partners to conserve, enhance and improve our waterways within the Borough and nationally. We believe that our expertise and responsibility for waterspace, combined with the ownership of docks, canals and waterside properties, puts us in a unique position to facilitate redevelopment for economic, social and environmental gain. The canals in particular have historically experienced a prolonged period of decline. However, in recent years, the canals and navigable rivers have experienced significant development pressures from mixed use, commercial, residential, tourism/recreation and other developments. Attractive waterside environments have stimulated this interest and been at the heart of some of the most significant regeneration schemes in London (and the borough), including the Queen Elizabeth Olympic Park.

Our waterways are helping to stimulate regional, sub-regional and local economies and are being used successfully as tools in improving community well-being, urban and housing offers; attracting and generating investment; place making and shaping; as well as in delivering wider public benefit. They are also making an increasingly important contribution to the visitor economy and there is a growing national awareness of the added value and commercial betterment deriving from the presence of waterways in developments.

The health and performance of the inland waterway network is directly linked to the quality of the neighbourhood and environment through which waterways passes. The public benefit delivered by the inland waterway network in turn is substantially dependent upon its health and performance. The Town and Country Planning Association's Policy Advice Note: Inland Waterways (2009) outlines the value of the waterways to local economies and health and well-being aims, providing a comprehensive framework for assisting in the delivery of high quality public waterspaces and waterside developments, and should be referenced within these documents: <http://www.tcpa.org.uk/pages/inland-waterways.html>

We passionately believe that our London network of multi-functional canals, navigable rivers and docks have significant untapped potential to deliver leisure, recreation, tourism, culture, heritage, biodiversity, education, sustainability and regeneration opportunities. For example, our waterways can help to deliver the LDF's objectives by, amongst other things:

1. Encouraging high quality, mixed use, waterside regeneration schemes with an appropriate mix of moorings can help to transform London's inclusive canals and navigable rivers and improve access to the towpath and the water for active use as open-air gyms or as quiet places to address inequalities in physical and mental health;
2. Promoting the waterways as 200-year old 'working heritage' which are part of the third largest heritage estate in England and attract innovative and entrepreneurial businesses on and by the water;
3. Place-making with the waterways integrated at the heart of new and existing communities contributing towards high quality environments;

4. Transforming the city with well maintained and managed waterways in iconic locations with high quality modern architecture, complementing 200-year old working heritage that can help to improve Londoner's health (open air gyms), welfare (strong focus for communities) and development (opportunities for volunteering, education, etc);
5. Helping London to mitigate and adapt to climate change; and
6. Providing a truly sustainable 100-mile long, transport network right across London for walking, jogging, cycling, waterborne passengers and freight.

We have the following specific comments to make on the documents:

Draft Development Management Policies

Proposed Policy DMHB25 – Moorings

We are pleased to note the inclusion of this policy, which will help meet the demand for residential moorings in the borough.

Paragraph 5.108 does not reflect the range of moorings that can be provided, for example residential, leisure, commercial, trading and visitor moorings. Moorings require planning permission when there is a material change of use of the waterway, which usually includes permanent residential and trading/commercial moorings. The Canal and River Trust has permitted development rights afforded to it as a statutory undertaker to provide physical works associated with moorings, and this should be reflected in the text.

We also note that at paragraph 5.108 that the Trust has been incorrectly referred to as the Canal and Rivers Trust. The correct name is the Canal and River Trust. It is also noted that the apostrophe is in the wrong location and the sentence should read "*...by the Canal and River Trust's statutory powers.*"

We are concerned that there appears to be little justification for criterion (i) of the policy. The mooring of boats on the waterway is part of their character and in many cases it may not be possible to distinguish between a boat in leisure use (which would not require planning permission) and a boat in residential use. Residential moorings vary greatly in their level of facilities and infrastructure. Some sites provide full services such as individual pontoons, secure entry and a facility block, whilst others are more modest moorings along a canal bank with only water, electricity and refuse on site, with sewage disposal a short cruise away. Therefore we would argue that the siting of residential moorings within rural or open stretches of the canal would not necessarily be incongruous, subject to the level of facilities proposed. We consider that the visual impact of moorings is addressed at part (iii) and that part (i) is therefore superfluous.

With regard to part (v), we note that it is not always necessary for services to be provided on site as boats are able to move to certain services. For example, there may be a site suitable for residential moorings by virtue of its close proximity to existing sewage and refuse disposal

services. In this situation it would not be necessary to provide additional facilities, other than basic water and electricity connections which do not involve any significant operational development.

While it is desirable to provide services, there are many moorings that do not have full services (electricity, water, waste, sewage) which work well. The Trust would not always require full services, depending on what is available nearby and the scale of the proposal. We also note that there is no requirement in the London Plan for new moorings to provide full services and we would therefore question whether the policy is consistent with the London Plan.

The text of part (v) of the policy should be amended to state that “Adequate service facilities should be provided, potentially including water, electricity, waste and sewage. The provision of some services off-site may be considered appropriate where these are located in close proximity to the proposed site.”

Proposed Policy DME17 – Biodiversity Protection and Enhancement

Although the Trust supports the policy, it should be noted in the third paragraph that any biodiversity improvements should not hinder the navigational function of the canal. For example, the use of floating vegetation baskets in certain locations would not be appropriate where they might pose a hazard to boats.

River and Canal Corridors (Paragraph 6.26)

At paragraph 6.26 the Trust is incorrectly referred to as the Canal and Rivers Trust. We would appreciate this to be corrected. This error is repeated at paragraph 6.29 part 5) where the Trust is referred to as the Rivers and Canal Trust.

All Waterways (Paragraph 6.31)

There may be occasions where developments rising sheer out of the canal on the non-towpath side will be appropriate. This occurred historically with industrial buildings being built right up to the canal edge to take advantage of the canal transportation system. This should be reflected within the text of paragraph 6.31.

Canals (Paragraph 6.33 and 6.34)

As stated above, moored boats form a part of the character of the waterway, whether in a rural or urban stretch of the canal. The Trust considers that basic facilities could be provided within the Metropolitan Green Belt or Metropolitan Open Land without harming openness or amenity. For example, the provision of electricity or water services to moorings can be achieved with the need for very little operational development with a de minimis impact upon openness. We do not consider the mooring of boats to be harmful to the openness of the Green Belt, particularly as visitor and residential moorings can often be indistinguishable. We would agree that the provision of communal facility blocks within the green belt may be harmful, however there may be locations where new residential moorings in rural locations could be provided that make use of existing

waste and sewage facilities whilst providing new water and electricity services. The Trust would therefore like paragraph 6.34 amended to reflect this.

Policy DMEI8: Waterside Development

As with policy DMEI7, it should be stipulated in the third paragraph of the policy that biodiversity improvements should not hinder navigation on the canal.

Proposed Policy DMT5: Pedestrians and cyclists

The Trust supports this policy and the increased use of the canal towpath as a pedestrian and cycle route. We are pleased to see that the Plan seeks to improve links to the canal network and provide for passive surveillance. Contributions to towpath improvements should be made available from funding collected from the Hillingdon CIL or s106 contributions.

Draft Site Allocations and Designations

SA10: Land to the South of the Railway, including Nestle.

This site has a canalside frontage and care should be taken to ensure that the benefits of this frontage are maximised; this should include active uses such as restaurants, cafes, community facilities on the ground floor. The Trust considers that the site could be an appropriate location for a community water sports club, which would activate that canal front edge and provide recreation activities for young people in the area.

The Trust also considers that there is an opportunity for the site to accommodate permanent residential moorings along this stretch of the canal and this should be incorporated into the designation.

The Trust would support better linkages from the site to Hayes Town Centre. The Trust would not be opposed in principle to a suitably located and designed footbridge across the canal to link the site up with the towpath and also to improve connectivity between the towpath and the Town Centre. The existing vehicular bridge at North Hyde Gardens should also be improved for pedestrians and cyclists with the possibility for steps from the road down to the towpath.

SA19 Silverdale Road/Western View

This site has a canalside frontage and care should be taken to ensure that the benefits of the frontage are maximised. The existing dock here is privately owned and is not owned by the Canal and River Trust. Any development of this site should retain the dock as it should become a feature of the development and should not be filled in. The retention of the dock should be highlighted within policy SA19. Given that the site is located on the towpath side any canalside improvements should be agreed with the Canal and River Trust.

SA25 Cape Boards

We support the proposal to make this land available for a residential-led mixed use development. Canalside improvements should be agreed in consultation with the Canal and River Trust and the development should make a contribution to towpath and environmental enhancements.

SA27 Hayes Bridge

We support the redevelopment of this site. Given its non-towpath location the site would be suitable for residential moorings and this should be a feature of the redevelopment of the site.

SA29 Hayes Bridge

We support the redevelopment of this site. Given that the site is located on the towpath any canalside improvements should also be agreed with the Canal and River Trust.

I hope these comments are clear. Should you have any queries please feel free to contact me.

Yours sincerely,

Russell Butchers
Area Planner - London



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	Mr		
First name	Russell		
Last Name	Butchers		
Organisation (if relevant)	Canal and River Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title			
First name			
Last name			
Company			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Please refer to attached letter.
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please refer to attached letter.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please refer to attached letter.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

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Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the

Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Empty rectangular box for providing comments.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
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Monitoring Questions

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HILLINGDON

LONDON

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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME111 Water Management (SUDS)
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
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Policy DME11 is not reasonable as it does not provide enough flexibility for sites where it is not feasible to provide greenfield runoff rates.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy DME111 should be amended as follows:

*“... All ~~m~~Major new build developments ~~must be designed~~ **should seek** to reduce surface water run-off rates to no higher than the predevelopment greenfield runoff rate in a 1:100 year storm scenario, plus 30% allowance for climate change for the worst storm duration. The assessment is required regardless of the changes in impermeable areas and the fact that a site has an existing high run-off rate will not constitute justification.*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
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N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



HILLINGDON

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DME12 Water Quality
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME112 Water Quality is not justified. It is too descriptive and not considered to be appropriate for a local plan policy. The policy should be deleted or a less detailed policy drafted that seeks to ensure that developments do not have an adverse impact on water quality.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy DME112 should be deleted.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DME15 Water Efficiency in homes
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It is often the case that the highest possible Code for Sustainable Homes target is not viable to a project. Requiring developers to achieve the highest target possible is neither realistic nor achievable.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DMEI15 should be amended as follows:

*“New residential development should demonstrate efficient use of natural resources, including water and aim to achieve the highest possible **feasible** rating in the Code for Sustainable Homes (CSH).”*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DME118 Air Quality
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It is unreasonable to require developments that are in areas already above the national and European regulated levels to demonstrate reductions in emissions to ensure air quality levels for existing receptors are met. These matters may be out of the control of developer, making the policy un-implementable and unnecessarily stifling development.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The policy should be reworded to be less of a constraint on development.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMH7: Provision of Affordable Housing
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The requirement for developments to provide affordable housing is rightly identified within policy DMH7 as being required “subject to viability” and therefore the following bold text is unnecessary and should be deleted:

“A) ii) Subject to viability **and if appropriate in all circumstances** a minimum of 35% of all new homes ...”

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DMH7 should be reworded as follows:

“A) ii) Subject to viability a minimum of 35% of all new homes ...”

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Our client would like to reserve the right to appear at the examination should the above representation not be addressed.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB1: Heritage Assets
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMHB1 is not compliant with government policy as it states development that has an effect on heritage assets will only be supported where "...Aii) it does not result in harm or loss of significance of the heritage asset..."

To meet National Policy when considering the impact of a proposed development the significance of a designated heritage asset should be identified and the degree/level of harm considered.

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, paragraph 133 of the NPPF is clear that local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that other criteria applies.

Furthermore, paragraph 134 identifies that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy DMHB1 should be reworded to be consistent with National Policy.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box) N/A

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Last Name			
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Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
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2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB5 Locally Listed Buildings
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMHB5 implies that demolition of locally listed buildings will only be considered if it can be demonstrated that the community benefits of the proposal outweigh retention of the locally listed building. However the wording is misleading as any new building will not replicate the features of the locally listed building but will create a new modern building.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DMHB5 should be amended as follows:

Extensions and alterations to locally listed buildings will be expected to preserve their local identity and character. They should be of appropriate design, scale and materials. Their replacement **loss** will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the locally listed building. Applications should include a Statement of Significance which demonstrates a clear understanding of the impact of the proposals on the significance of the locally listed building.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box) N/A

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB16 Living Walls and Roofs
Paragraph Number; or	5.63
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMHB16 identifies that all new major development should incorporate a living wall where appropriate. Furthermore para 5.63 that supports this policy identifies: "... Whilst it is unlikely to be able to deliver living walls on all elevations, as a minimum developers will be expected to provide part of an elevation as a living wall. It is considered that such a requirement is unrealistic. Innovative building design should not be restricted by such a requirement and given the maintenance needs and that new buildings may not be located in positions where the conditions are suitable for living walls, it is requested that the policy is amended.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy DMHB16 should be amended as follows:

“... Living walls will be encouraged and all new within major development, should incorporate a living wall where appropriate.”

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB19 Private Outdoor Amenity Space
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMHB18 should provide flexibility in connection with meeting Council's private amenity space standards. The current drafting does not provide any flexibility and is therefore not effective. For example, where development proposals involve a listed building or locally listed building it may not be possible to meet the amenity space standards.

Furthermore, we question why the policy departs from the Mayor's Housing Design Guide (standard 4.10.3) in connection with balcony sizes and consider that the standard referred to in Policy DMHB18 should be amended accordingly.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policy DMHB19 should be amended as follows:

*“...Amenity space should **normally** be provided in accordance with the standards set out in Table 2;*

*Balconies should have a depth of not less than 1.5 metres and a width of not less than **2-1.5 metres....”***

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table at Paragraph 4.9
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Paragraph 4.8 identifies that a significant proportion of housing need can be met through the provision of one and two bed units in town centres. It also notes that the Council will also continue to support the provision of a proportion of smaller units both in out of centre locations, to meet the housing needs of those who wish to pursue quieter lifestyles. Furthermore para. 4.7 notes that projections envisage that the general trend towards smaller households will continue.

However, the table below para 4.9 does reflect this approach and does not include provision for any 1 bed units and only 4% two bed units in the private sector. This is unrealistic and inconsistent with the supporting text, particularly as Crossrail is likely to make parts of the borough more attractive to young people who are likely to require 1 and 2 bed units.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The table below para 4.9 should be corrected and the accompanying text should clarify that variations will be acceptable in areas of higher public transport accessibility.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box) N/A

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Our client would like to reserve the right to appear at the examination should the above representation not be addressed.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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First name			
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Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	5.71-72 Minimum Floorspace Standards
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Paragraph 5.72 relates to minimum floorspace standards based on The Mayor's Housing SPD (2012). In accordance with the SPD (para. 2.3.16) the accompanying text within the Development Management Policies should clarify that bedrooms over 11.5sqm will be considered to be double rooms and not rooms over 10sqm. We do not consider there is justification to depart from the standards set out in the London SPD.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Paragraph 5.72 should be reworded as follows:

“When assessing the size of households the Council will assume that any bedroom over 10 **11.5 sq metres** is capable of being occupied by two persons...”

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Purplexed LLP		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Ms		
First name	Hannah		
Last name	Whitney		
Company	Nathaniel Lichfield & Partners		
Unit	14	House number	
House name			
Address 1	Regent's Wharf		
Address 2	All Saints Street		
Town	London		
County	Greater London		
Postcode	N1 9RL		
Telephone	020 7837 4477		
Email	hwhitney@nlplanning.com		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 3
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The NPPF establishes a presumption in favour of sustainable development. Para. 14 of the NPPF identifies that for plan-making sustainable development means that local planning authorities “...should positively seek opportunities to meet the development needs of their area.” The London Plan includes a density matrix **to guide** development within London. This ranges from 150-200hr/ha in suburban areas with low accessibility to 650-1100hr/ha in central locations that are highly accessible. Whilst the London Plan identifies that Local Authorities can establish their own density matrix we consider that the densities noted in Table 3 are inappropriately low and do not address accessible sites outside the town centre.

For example, there are locations such as The Old Vinyl Factory where higher densities outside the town centre have been accepted by the Council (approx 600 hr/ha). However following the matrix at table 3, such densities would only be appropriate in Uxbridge Town Centre.

Given the acute housing need within London it is considered that the low densities set out in the matrix should be reviewed and that additional flexibility should be provided.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Given the accessibility improvements that Crossrail will bring to parts of the borough, we consider the matrix should be reviewed and additional categories added to the matrix to reflect locations outside the town centre, where there is good accessibility to public transport interchanges now or in the near future.

Alternatively the following could be added to the supporting text: **“Densities higher than those set out within Table 3 may be acceptable on individual developments, where there are clearly and robustly justified local circumstances, e.g. sites in close proximity to cross rail stations, where it can be demonstrated that the higher densities will not compromise design quality.”**

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Our client would like to reserve the right to take part in the examination if this important matter is not addressed within the revised Local Plan Part 2.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
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Address 2	
Town	
County	
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Email	

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA2
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA2 should be updated to reflect the most recent planning history of the site.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

(NB: ~~strikethrough~~ – should be deleted; **bold – to be added**)

1. Policy SA2: The Old Vinyl Factory and Gatefold Building, Hayes

“The Old Vinyl Factory

*In accordance with the approved planning permission (ref.: 59872/APP/2012/1838 **as amended**) the Council will support the development of the following uses on the site:*

- *demolition of up to 12,643 sqm of buildings and construction of up to 112,953 sqm **of new floorspace**;*
- *up to 510 residential units (maximum area of 49,000 sqm GEA);*
- *up to 7,886 sqm of new B1 floorspace;*
- *up to 4,000 sqm of A class uses (A1, A2, A3, A4, A5);*
- *up to 4,700 sqm of D1 and D2 uses;*
- *an energy centre (up to 950 sqm);*
- *Other associated works including car parking and access and landscaping.*

The Gatefold Building

In accordance with the approved planning permission (ref.: 51588/APP/2011/2253) the Council will support the development of the following uses on the site:

- *132 apartments;*
- *Café/community room of 340 sq m GEA (The Glass House);*
- *Workshop units totalling 382 sq m GEA;*
- *Access, landscaping and parking; and*
- *A children’s play area.*

*The Council will seek to secure the development of the site in accordance with this permission, **but will consider amendments where appropriate in the context of Local Plan policies and on the basis of residential-led mixed use development.**”*

2. The ‘Site Information’ Table (page 20) should also be amended to reflect the removal of The Old Vinyl Factory and Gatefold Building from Industrial and Business Area under Policy SA2 as follows:

Designation - ~~Industrial Business Area~~; Botwell Thorn EMI, Conservation Area.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box) N/A

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
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Monitoring Questions





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First name			
Last Name			
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Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/> 1.1	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Hayes West

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/> P	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Given the Outline Planning Permission (ref. 59872/APP/2012/1838 as amended) for residential-led mixed use development at this site, Purplexed LLP support the removal of Strategic Industrial Land (SIL) designation and the identification for residential-led mixed use redevelopment under Policy SA2.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

N/A

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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First name			
Last Name			
Organisation (if relevant)	Workspace Group Plc		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB1: Heritage Assets
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMHB1 is not compliant with government policy as it states development that has an effect on heritage assets will only be supported where "...Aii) it does not result in harm or loss of significance of the heritage asset..."

To meet National Policy when considering the impact of a proposed development the significance of a designated heritage asset should be identified and the degree/level of harm considered.

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, paragraph 133 of the NPPF is clear that local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or that other criteria applies.

Furthermore, paragraph 134 identifies that where a development proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DMHB1 should be reworded to be consistent with National Policy.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box) N/A

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Last name	Whitney
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Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA1 (pg 20)
Paragraph Number; or	
Table or Figure Number; or	Table 3.2 (pg14)
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
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<input checked="" type="checkbox"/>	It is not effective
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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA1 is out-of-date and inaccurate and should be updated to reflect the most recent planning history for the Enterprise House where permission has been granted for refurbishment and repair works under Listed Building Consent (ref.1623/APP/2013/3592) and Planning Permission (ref. 11623/APP/2013/3606) to enable mixed use residential and employment uses. Policy SA1 as drafted requires scheme details which have been demonstrated by the developer to be unviable and these points have been accepted by the Council in the approval of the Enterprise House scheme (e.g. the approved development includes car parking integral to building and external walkways etc). Given the above a number of changes should be made to Policy SA2.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

(NB: ~~strikethrough~~ – should be deleted; **bold** – to be added)

1. Supporting text of Policy SA1 (second paragraph – page 17) should be amended to recognise that listed building consent and planning permission was granted in 2014 for refurbishment and repair works at this site as follows:

~~“Enterprise House is a Grade II listed structure that has been neglected in recent years. It is not, however, considered to be in such poor condition as to warrant action from the Council at present. Any redevelopment proposals should be discussed with the Council in advance of the submission of a planning application, to ensure the historic value of the building is addressed. Listed building consent (ref. 11623/APP/2013/3592) and planning permission (ref. 11623/APP/2013/3606) was granted in 2014 for the refurbishment and repair of Enterprise House to create 96 residential units, car parking and retention of approximately 4,500 sqm (GIA) of employment use at ground and first floor levels with an ancillary cafe.”~~

2. ‘Policy SA1: Enterprise House, Hayes’ should be updated to refer to the listed building consent and planning permission granted in 2014 for the Enterprise House as follows:

~~“In accordance with the approved listed building consent (ref. 11623/APP/2013/3592) and planning permission (ref. 11623/APP/2013/3606) the Council will support the refurbishment of the Enterprise House for the following uses on the site:~~

- ~~96 residential units;~~
- ~~Retention of approximately 4,500 sqm (GIA) of employment use (B1 (a-c) and B2) with ancillary café at ground floor and first floor level;~~
- ~~Other associated works including partial demolition, car parking and landscaping.~~

Any amendments to this consent or future development proposals should

~~The Council is of the view that Enterprise House is suitable to accommodate residential led mixed use development with commercial uses at ground floor level. Redevelopment should respect the Listed status of the building and meet the following criteria:~~

- ~~Parking should not be accommodated within the original building envelope;~~
- ~~Any subdivision to create residential units should protect the original open quality of the spaces within the building;~~
- ~~Shared circulation spaces and access cores should be contained within the building;~~
- **Pay particular attention should be paid to the retention of historic features that are important to the listed status of the building. These include the north lights at roof level and the original window frames;**

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

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Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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PART A - Your Details (must be completed)

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1. Name and Address			
Title	C/O Agent		
First name			
Last Name			
Organisation (if relevant)	Workspace Group Plc		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Ms
First name	Hannah
Last name	Whitney
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
1.1	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Hayes West

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/> P	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Given that Listed building consent (ref. 11623/APP/2013/3592) and planning permission (ref. 11623/APP/2013/3606) was granted in 2014 for the refurbishment and repair of Enterprise House to enable residential led development, Workspace Group Plc support the removal of the Strategic Industrial Land (SIL) designation and the identification of Enterprise House for residential-led mixed use redevelopment under Policy SA1.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

N/A

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address			
Title	MRS		
First name	DIANE		
Last Name	FRANK		
Organisation (if relevant)	FOR: MRS DIANE FRANK, CATHERINE BECHADE + BELIKAT		
Unit	House number	PM LTD	
House name			
Address 1	c/o Agent		
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)		
Title	MR	
First name	MARTIN	
Last name	FRIEND	
Company	VINCENT AND GORBING	
Unit	House number	
House name	[REDACTED]	
Address 1	[REDACTED]	
Address 2		
Town	[REDACTED]	
County	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email	w [REDACTED]@vincentandgorbing.co.uk	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number: or	SEA 1
Paragraph Number: or	
Table or Figure Number; or	MAP B: SPRINGFIELD ROAD.
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SEE ATTACHED

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

SEE ATTACHED

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

TO FULLY REVIEW THIS ISSUE

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Empty box for comments.

Please continue on a separate sheet if necessary

Representations to Hillingdon Local Plan Part 2 : Site Allocations and Designations

Note : the following text will be placed on the Representation Form with the details of the respondent and V&G as agents)

Objection to Policy SEA1 : Strategic Employment Locations

Map B : Springfield Road

The Springfield Road Employment Area is defined within the Local Plan as a Strategic Industrial Location (SIL). Unlike several of the other designations which are clustered in defined areas of the Borough, the Springfield Road area is an isolated and relatively small SIL.

However, the area plays a vital role in the employment land offer of the Borough and it is right that its status should be recognised. The Employment Land Review (2014) indicates high levels of occupancy (91%). This SIL plays a particularly important role in offering a range of sites, including units for small businesses, which have a critical role in the economic well-being of the Borough.

However, the designated area shown on Map B has been substantially eroded in recent years due to the incursion of retail and quasi-retail uses into the area, particularly on the Uxbridge Road frontage. The development of the Elystan Business Centre with a number of retail units, together with a number of cash and carry warehouses and trade counter activities within the estate has reduced the contribution of the SIL in providing space for business activities and promoting sustainable economic growth.

As such, to be sound, the employment area should be expanded to allow for new employment development over the plan period to counter the loss of B use employment land on the estate in recent years.

In order to make the plan sound, our client's land at Springfield Road should be removed from the Green Belt and included within the Strategic Employment Location. The site is available and deliverable. Moreover, it does not merit inclusion within the Green Belt (as set out in our representations in respect of Green Belt deletions).

Given the size of the site it would clearly be appropriate for small business development consistent with policy E6 of the Core Strategy. It is likely that the site could generate approximately circa 6,800sq.m. (73,000sq.ft.) of small business B1 floorspace.

A range of technical issues have been considered addressing the deliverability of development on the site. The site has a frontage to Springfield Road. The traffic generated by development of the site would not be significant and could easily and safely route to Uxbridge Road. No significant impact on highway conditions or safety would result. The site lies outside of any area that may be at risk of flooding. Given the history of the site, there is unlikely to be any adverse ground conditions

or contamination present. The site has no ecological value (see our representations to SINC6). In addition, the site lies within a single ownership.

No impediment is considered to exist that would prevent the site coming forward in the short term for development.

The failure to allow for business expansion to Springfield Road renders the Local Plan unsound in this regard. Considering the criteria in the NPPF :-

- The plan has not been positively prepared. No consideration has been given to providing additional land at Springfield Road in the future. The plan is solely looking to protect existing land in this location even though there has been an historic erosion of B use employment floorspace.
- The plan is not justified in this regard. The only assessment of employment land has been undertaken on a Borough-wide quantitative basis without consideration of ensuring the future vitality of individual employment areas – particularly Springfield Road. No reasonable alternative beyond simply protecting existing land uses has been considered.
- As such the plan will not be effective in ensuring the longevity and future vitality of the Springfield Road SIL.
- As such the plan is not consistent with national policy as it does not assist in promoting sustainable growth and development in accordance with the policies in the Framework.

Change to make the Local Plan sound

Extend the Springfield Road employment area to include 1.36ha. of land on Springfield Road shown on the attached plan.

PART C - Information on the progress of the Local Plan Part 2

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- SITE BOUNDARY
1.36ha 3.16ac
- EXISTING GREEN BELT BOUNDARY
- BOUNDARY ADJUSTMENT
- SPRINGFIELD ROAD STRATEGIC INDUSTRIAL LOCATION
- PROPOSED STRATEGIC INDUSTRIAL LOCATION EXTENSION

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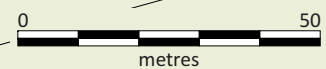
PROJECT TITLE
**Land at Springfield Road,
HILLINGDON**

DRAWING TITLE
**London Borough of Hillingdon
Local Plan: Part 2
Proposals map amendment**

SCALE	DATE	CHECKED
1:1250	OCTOBER 2014	
	DRAWN	DATE
	HNA	

PROJECT No.	N	003
4977		

VINCENT AND GORBING
CHARTERED ARCHITECTS AND TOWN PLANNERS
 STERLING COURT NORTON ROAD STEVENAGE HERTS
 TELEPHONE: 01438 316331 FAX:01438 722035



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1. Name and Address	
Title	MRS
First name	DIANE
Last Name	FRANK
Organisation (if relevant)	FOR: MRS DIANE FRANK, CATHERINE BECHADE + BELIKAT
Unit	House number PM LTD
House name	
Address 1	c/o Agent
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	MR
First name	MARTIN
Last name	FRIEND
Company	VINCENT AND GORBING
Unit	House number
House name	[REDACTED]
Address 1	[REDACTED]
Address 2	
Town	[REDACTED]
County	[REDACTED]
Postcode	[REDACTED]
Telephone	[REDACTED]
Email	[REDACTED] vincentandgorbing.co.uk

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:

(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	PARA 5.2 - 5.7 PROPOSED GREEN BELT DELETION.
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SEE ATTACHED

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

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Please continue on a separate sheet if necessary

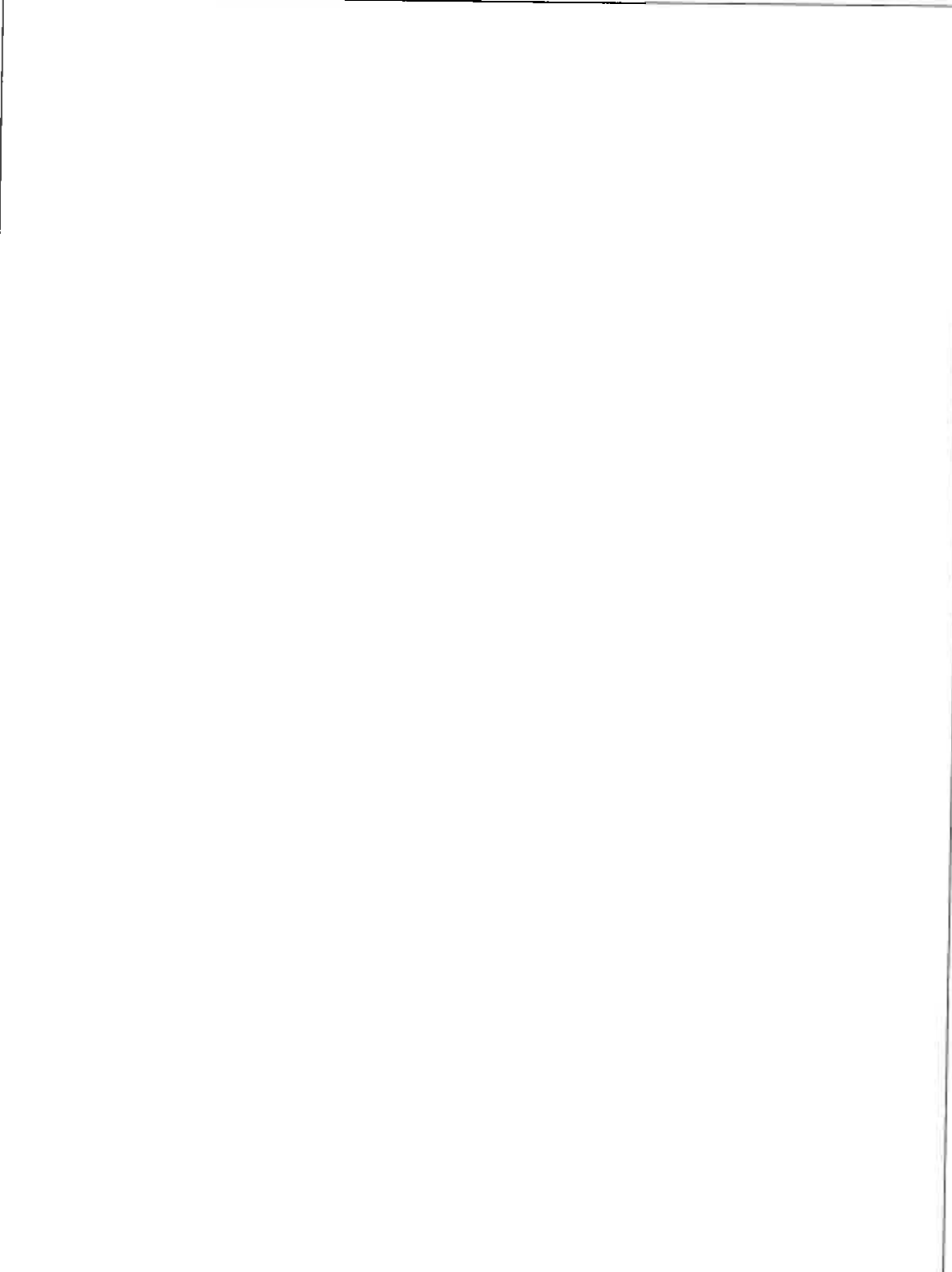
Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

TO FULLY REVIEW THIS ISSUE

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.



Please continue on a separate sheet if necessary

Objection to Green Belt deletions and overall extent of the Green Belt (page 103)

Land at Springfield Road should be removed from the Green Belt and allocated for employment purposes to allow for expansion of the Springfield Road Strategic Industrial Location (see our other objection to Policy SEA1).

The site does not merit its current Green Belt designation and should be deleted from the policies map as Green Belt.

The National Planning Policy Framework sets out five purposes of including land in Green Belts, namely:-

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns from merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site forms part of an area of Green Belt which lies between the Springfield Road employment area and the Hayes By-pass (A312) and retail and residential development beyond. This wider area of Green Belt performs two functions. First, it creates a break in the urban area which is perceived when travelling along the Uxbridge Road which runs past the northern extreme of this finger of Green Belt. The second function is a recreational one. The Green Belt contains areas of external sport, including the Minet cycle track and the Goals Soccer centre.

However, the subject site does not meaningfully contribute to these functions. It has no sporting function (nor any sporting potential) and given its location, performs only a limited visual function, perceived by those travelling down Springfield Road itself. It does not form part of the Minet Country Park and has never done so.

The NPPF (para.85) makes clear that when defining Green Belt boundaries, local planning authorities should “not include land which it is unnecessary to keep permanently open.” Moreover, they should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. The long term requirement to allow expansion at the Springfield Road SIL has clearly *not* been considered.

Release and development of the land would not be harmful to the purposes of the Green Belt in this location, for the following reasons:

- The proposed development would not represent urban sprawl or an extension of the urban area into open countryside but rather a limited ‘rounding off’ of existing development. The boundary would follow a consistent north/south alignment with the remaining boundary associated with the Springfield Road employment area;

- The remaining area of Green Belt would be no narrower than that which already exists to the north of the site. Hence the development of the site would not lead to the Springfield Road employment area being closer to, or merging with, the development to the west.
- The development of such a small site will cause no adverse impacts on the Council's urban regeneration objectives.

Existing site boundaries are clear and defensible and will accord with the advice of the Framework that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent.

Given the above, we do not consider the site plays any meaningful Green Belt role or function and its release from the Green Belt would not be harmful. In contrast, the development of the land for employment, as set out in our representations to Policy SEA1 would make a positive contribution to the vitality of the Springfield Road SIL. It's continued designation as Green Belt is therefore unsound.

In the terms of the NPPF

- The plan has not been positively prepared. No consideration has been given to the role of the land within the Green Belt, the Plan simply rolls forward an existing designation. The designation of the land for employment would make a positive contribution to sustainable development by allowing the expansion of the Springfield Road SIL.
- The plan is not justified in this regard. The assessment of Green Belt has not considered whether it is necessary to retain this land in the Green Belt. No reasonable alternative beyond simply protecting the existing designation been considered.
- As such the plan is not consistent with national policy as it does not assist in promoting sustainable growth and development in accordance with the policies in the Framework.

Change to make the Local Plan sound

Remove the Green Belt designation from the land Springfield Road and redefine as part of the Springfield Road SIL.

PART C - Information on the progress of the Local Plan Part 2

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Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by 5pm Tuesday 4th November 2014.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	MRS
First name	DIANE
Last Name	FRANK
Organisation (if relevant)	FOR: MRS DIANE FRANK, LATHERINE BECHADE + BELIKAT
Unit	House number: PM LTD
House name	
Address 1	c/o Agent
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	MR
First name	MARTIN
Last name	FRIEND
Company	VINCENT AND GORBING
Unit	House number
House name	STERLING COURT
Address 1	NORTON ROAD
Address 2	
Town	STEVENAGE
County	HERTS
Postcode	SG1 2JY
Telephone	01438 316331
Email	martin.friend@vincentgorbing.co.uk

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	-
Paragraph Number; or	5.19
Table or Figure Number; or	TABLE 6.1 - SINCE EXT 6 - PLAN ON PAGE 139
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SEE ATTACHED NOTE, PLAN AND
ECOLOGICAL APPRAISAL

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

SEE ATTACHED. REMOVE SITE FROM SINC.

Please continue on a separate sheet if necessary

Objection to SINC Ext 6 (plan on page 139)

Proposed extension to existing Nature Conservation Site of Metropolitan or Borough Grade I Importance Yeading Brook, Minet Country Park and Hitherbroom Park

The Local Plan proposes extension of an existing Site of Nature Conservation Importance (SINC) adjoining the Hayes By-pass on to the remainder of the Minet Country Park together with our client's land at Springfield Road. The existing site to the south was previously designated as a Nature Conservation Site of Metropolitan or Borough Grade I Importance and is known as "Yeading Brook, Minet Country Park and Hitherbroom Park" SINC.

The extension of the designation on to our client's land at Springfield Road is entirely unjustified and renders the Local Plan unsound in this regard. There is no evidence that the Council have undertaken any assessment of its biodiversity value and, indeed, our client has allowed no access to the site by the Council or any organisation acting on their behalf.

Our client has recently instructed well known ecologists, Ecology Solutions Limited, to independently consider whether the designation is justified. Their report is attached to these representations and demonstrates clearly that the extension of the designation to include our client's land has no evidential basis. In summary, their report demonstrates clearly that the site does not meet recognised criteria for designation:-

- The site is not of any significant ecological value and losses to it cannot be deemed detrimental to the Borough's nature conservation assets.
- The site does not contain plant species which are rare at any level, local or otherwise, and the site would not likely be important to protected or notable faunal species.
- The site is essentially species poor grassland which is not under-represented in the local area and better quality grassland is understood to be present within the existing SINC boundaries.
- In preparing the revised citation and boundary plans there cannot of been any detailed survey information on which to base the judgements being made.

In summary, there are currently no grounds on which the site should come forward for designation as part of a SINC. Specific surveys have shown the land to be of limited botanical / habitat diversity and its value to nature conservation in general is minimal.

The Local Plan is therefore unsound in this regard as it is not justified. It is not an appropriate strategy to designate land that has no ecological value as being protected for this value. The designation is supported by no evidence. Designation of land must be fully justified and must be based upon sufficient evidence. There can be no reasonable scientific justification for including the site within the boundaries of the proposed SINC extension.

Change to make the Local Plan sound

Remove the designation from the land at Springfield Road as shown on the attached plan.

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

TO FULLY EXPLORE THIS ISSUE

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.



- SITE BOUNDARY**
1.36ha 3.16ac
- LOCAL PLAN PROPOSED SINC EXTENSION EXT 6**
- SINC BOUNDARY AMENDMENT**
- LAND TO BE EXCLUDED FROM SINC**

NOTE:
Boundary to be amended on proposals map and plan on page 139

© Vincent & Gorbng Limited

PROJECT TITLE
**Land at Springfield Road,
HILLINGDON**

DRAWING TITLE
**London Borough of Hillingdon
Local Plan: Part 2
SINC boundary amendment**

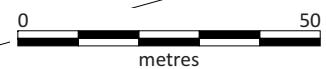
SCALE	DATE	CHECKED
1:1250	OCTOBER 2014	
	DRAWN	DATE
	HNA	

PROJECT No.	N	004
4977		

VINCENT AND GORBING

CHARTERED ARCHITECTS AND TOWN PLANNERS

STERLING COURT NORTON ROAD STEVENAGE HERTS
TELEPHONE: 01438 316331 FAX:01438 722035



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MRS DIANE FRANK,
MRS CATHERINE BECHADE AND
BELIKAT PTY LTD

LAND OFF
SPRINGFIELDROAD
HAYES
GREATER LONDON

Ecological Appraisal

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PLANS

PLAN ECO1 Image taken from Google Earth showing the Site location

APPENDICES

APPENDIX 1 Map and citation relevant to the proposed extension to the SINC

1. INTRODUCTION

1.1. Background & Proposals

- 1.1.1. Ecology Solutions was commissioned by Mrs Diane Frank, Mrs Catherine Bechade and Belikat PTY Ltd (the owners) in October 2014 to undertake an ecological appraisal, including botanical survey of a small parcel of land off Springfield Road, Hayes, Greater London. Ecology Solution was also instructed to assess the sites ecological value in the light of it being proposed to come forward as part of an extension to a locally designated site of importance for nature conservation.

1.2. Site Characteristics

- 1.2.1. The Site is located off Springfield Road in Hayes. It is roughly square in shape. To the immediate north is existing commercial development, to the east Springfield Road with existing commercial / industrial development beyond, to the south is a disused football ground. To the west lies an area of open land (Minet Country Park) understood to comprise grassland and scrub.
- 1.2.2. The Site itself comprises species poor grassland, which was previously grazed. The land is currently subject to regular mowing during the growing season to prevent the proliferation of scrub and notifiable agricultural weed species.

1.3. Assessment

- 1.3.1. This document assesses the ecological interest of the Site. The importance of the habitats present is evaluated with regard to current guidance published by the Institute of Ecology and Environmental Management (IEEM).

1.4. Habitat Survey Methodology

- 1.4.1. A habitat and botanical survey was undertaken by Ecology Solutions on the 20th October 2014. The survey focussed on identifying the main habitats and associated plant species. The survey data was used to inform conclusions in relation to the ecological value of the land contained within the boundaries of the Site.
- 1.4.2. The Site was surveyed based around extended Phase 1 survey methodology¹, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.
- 1.4.3. Using the above method, the site was classified into areas of similar botanical community types, with a representative species list compiled for

¹ Joint Nature Conservation Committee (1993). *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. England Field Unit, Nature Conservancy Council, reprinted JNCC, Peterborough

each habitat identified. The importance of the habitats present was evaluated with due consideration given to the current guidance published by the Institute of Ecology and Environmental Management (IEEM)².

² Institute of Ecology and Environmental Management (2006) *Guidelines for Ecological Impact Assessment in the United Kingdom* (version 7 July 2006). <http://www.ieem.org.uk/ecia/index.html>

2. ECOLOGICAL FEATURES

2.1. The Site was subject to an ecological survey by Ecology Solutions during October 2014. The vegetation present enabled the habitats to be satisfactorily identified and an accurate assessment of the ecological interest of the habitats to be undertaken.

2.2. The following main habitat / vegetation types were identified:

- Semi-improved grassland; and
- A standard tree.

2.3. No other habitat features are present, with the Site bounded by metal palisade fencing.

2.4. Each habitat identified during the ecological survey work is described below with an account of the representative plant species present.

2.5. Semi-improved grassland

2.5.1. Semi-improved grassland with a ruderal compliment (most notably at the boundaries) is the dominant habitat. The grassland is understood to be regularly mown to prevent the encroachment of scrub and notifiable agricultural weeds. At the time of survey mowing had not been recently undertaken and despite some localised thatch within the sward a good compliment of species was observed.

2.5.2. Those species recorded are as follows, Perennial Rye Grass *Lolium perenne*, Cock's Foot *Dactylis glomerata*, Fescues *Festuca* spp, False Oat Grass *Arrhenatherum elatius*, Ribwort Plantain *Plantago lanceolata*, White Clover *Trifolium repens*, Common Mallow *Malva sylvestris*, Dove's-foot Cranes-bill *Geranium molle*, Creeping Buttercup *Ranunculus repens*, Dandelion agg. *Taraxacum officinale* agg, Common Ragwort *Senecio jacobaea*, Common Mouse-ear *Cerastium fontanum*, Broad Leaved Dock *Rumex obtusifolius*, Red Clover *Trifolium pratense*, Cleavers *Gallium aparine*, Bristly Ox-tongue *Helminthotheca echioides*, Yarrow *Achillea millefolium*, Smooth Sow-thistle *Sonchus oleraceus*, Spear Thistle *Cirsium vulgare*, Hairy Tare *Vicia hirsuta*, Black Medick *Medicago lupulina*, Prickly Sow-thistle *Sonchus asper*, Red Dead-nettle *Lamium purpureum*, Autumn Hawkbit *Scorzoneroides autumnalis*, Common Nettle *Urtica dioica*, Creeping Thistle *Cirsium arvense*, Common Field Speedwell *Veronica persica*, White Dead-nettle *Lamium album*, Hogweed *Heracleum sphondylium*, Small Flowered Crane's-bill *Geranium pusillum*, White Campion *Silene latifolia*, Lesser Burdock *Arctium minus*, Curled Dock *Rumex crispus*, Common Vetch *Vicia sativa* and Scentless Mayweed *Tripleurospermum inodorum*.

2.5.3. Of the above, all were infrequent within the sward which for the main part is dominated by grasses with a limited species compliment. Locally frequent and dense patches of White Dead-nettle, Hogweed and Common Nettle are present at the boundaries. Scentless Mayweed was recorded only at the compacted / disturbed ground at the entrance to the field.

- 2.5.4. It was noted that the site has clearly been subject to nutrient enrichment since some of the plants, especially the Clovers were very large.

2.6. **Standard Tree**

- 2.6.1. A single semi-mature Cherry *Prunus* sp. tree is present at the Site boundary in the north-western corner. This features does not offer potential roosting sites for bats. Any intrinsic value would in the main be associated with foraging / nesting opportunities for birds.

2.7. **Faunal use of the Site**

- 2.7.1. During the course of the survey notes were made on the use of the site by faunal species and assessments made in relation to the potential for the species present to be used by protected or notable species.
- 2.7.2. The only species observed during the course of the survey were Magpie, Kestrel, Pied Wagtails (2) and Wren. The Wren was observed off site to the west within Bramble and the other three species were all recorded in flight over the Site. No birds were recorded within the Site itself.
- 2.7.3. No evidence of use of the Site by Badgers was recorded.
- 2.7.4. Given the habitats present the Site would not be of any significant value to bats.
- 2.7.5. The potential value to common reptile species (rarer species would not be present given the habitats on site) is tempered significantly by the management regime which prevents the development of a diverse sward structure. It is also known that the Site was stripped in 2008 and re-seeded in 2010, so any colonisation would be entirely dependent on dispersing individuals from nearby populations (if present).
- 2.7.6. The site is expected to support a range of common invertebrate species, but there is no evidence to suggest that the Site would be important for any protected or notable species.
- 2.7.7. On the basis of the habitats present the Site is not expected to support any other protected or notable species.

3. ECOLOGICAL EVALUATION

- 3.1. The habitats described in Section 2 of this report have been considered in the context of their ecological value at the Site level and also with regard to their importance at the local and borough wide level.
- 3.2. The Cherry tree is of negligible intrinsic ecological value. At the Site level this feature offers some foraging or nesting opportunities for birds and a seasonal foraging / shelter resource for invertebrates. In the context of the wider area, including considerations at the local and borough wide level this feature could not be considered of nature conservation value.
- 3.3. The grassland is best described as species poor pasture comprising a compliment of species which are common at the UK and local level. Its value to any faunal species is very limited. At the site, local and borough wide level this feature could not be considered of significant nature conservation value.
- 3.4. The sites value at the borough level is considered further in the following section of this report.

4. CONSIDERATION OF THE SITE IN LIGHT OF ITS PROPOSED DESIGNATION

- 4.1. It is understood that the Site has been proposed for designation at the local level as part of the “Yeading Brook, Minet Country Park and Hitherbroom Park” Site of Importance for Nature Conservation (SINC - Borough Grade I). An extension to the existing SINC is proposed and this extension will include the Site.
- 4.2. A plan showing the proposed extension together with a citation is included at Appendix 1 of this report. This information has been reproduced from the document titled “Local Plan Part Two, Draft Proposed Site Allocations and Designations” (2002) (hereinafter referred to as the DPSAD) published by London Borough of Hillingdon.
- 4.3. Ecology Solutions have reviewed the information contained within the DPSAD in relation to the proposed extension to the SINC, insofar as it relates to the Site.
- 4.4. The following key points arise:
 - The Site is not of sufficient ecological value to merit designation;
 - The Site does not meet relevant criteria to support the designation;
 - The Site has not been subject to detailed ecological survey work to support the proposed extension.
- 4.5. The above points are discussed wherever relevant below.
- 4.6. As described in previous sections of this report, the site is of very limited ecological value comprising species poor pasture.
- 4.7. Criteria for the designation of SINCs within London are set out within the Mayor’s Biodiversity Strategy (2002). In relation to Borough Grade I SINCs the following is stated:

“These are sites which are important on a borough perspective in the same way as the Metropolitan sites are important to the whole of London. Although sites of similar quality may be found elsewhere in London, damage to these sites would mean a significant loss to the borough. As with Metropolitan sites, while protection is important, management of borough sites should usually allow and encourage their enjoyment by people and their use for education.

Since 1988 borough sites have been divided, on the basis of their quality, into two grades, but it must be stressed that they are all important on a borough-wide view.

In defining Sites of Borough Importance, the search is not confined rigidly to borough boundaries; these are used for convenience of defining areas substantially smaller than the whole of Greater London, and the needs of neighbouring boroughs should be taken into account. In the same way as for Sites of Metropolitan Importance, parts of some boroughs are more heavily built-up and some borough sites are chosen there as oases providing the opportunity for enjoyment of nature in extensive built environments.

The borough is an appropriate search area in relation to Planning Policy Guidance on nature conservation (1994) which, in paragraphs 15 and 25, states that local plans should identify, and include policies for, areas of local nature conservation importance.

Since essentially a comparison within a given borough is made when choosing Sites of Borough Importance, there is considerable variation in quality between those for different boroughs; for example, those designated in Barnet will frequently be of higher intrinsic quality than those in Hammersmith and Fulham, a borough comparatively deficient in wildlife habitat. Only those sites that provide a significant contribution to the ecology of an area are identified.”

- 4.8. The main points taken from the above are discussed below.
- 4.9. Notwithstanding other sites of similar quality may be present in London, damage to these sites in particular would “mean a significant loss to the borough”. Thus it is inherent within the guidance that the site (i.e. the designated land, in this case land within the extended boundary) must have sufficient nature conservation value (to merit designation) such that losses to it would be detrimental to the borough nature conservation assets. As discussed, the Site is not of any significant ecological value and losses to it cannot be deemed detrimental to the Borough’s nature conservation assets.
- 4.10. In some instances, where a borough is more heavily built up, sites which in other instances may not be chosen for designation (i.e. more limited intrinsic ecological value) can come forward on the basis that they are “oases providing the opportunity for enjoyment of nature”. This criteria is not applicable in this instance since the Site adds nothing of consequence to the existing SINC in terms of nature conservation value, but furthermore the Site is fenced and is not open to public access.
- 4.11. Sites should only be chosen which “provide a significant contribution to the ecology of an area are identified”. Survey evidence shows that the nature conservation value of the Site is not significant for the borough.
- 4.12. Consideration has been given to the added value the Site would bring to the SINC.
- 4.13. The Site does not contain plant species which are rare at any level, local or otherwise and the Site would not likely be important to protected or notable faunal species. Species poor grassland is not under-represented in the local area and better quality grassland is understood to be present within the existing SINC boundaries.
- 4.14. In line with relevant criteria, a site must be shown to have nature conservation value of a level worthy of protection through the planning system. It is not acceptable to designate on the grounds of a sites potential value. Any land could have ‘potential value’, subject to appropriate enhancement or management, but to designate on this basis seriously undermines the value of the network of locally designated sites.
- 4.15. Paragraphs 5.11 – 5.18 of the DPSAD gives a summary of the evolution of guidance and planning policy in relation to the designation of SINC’s in London.

Of particular note is paragraph 5.16. Here it is stated that the proposed revisions to the sites and boundaries of SINCs follow a review of SINCs in 2005 and that:

“The GLA in combination with the Borough carried out an extensive review of sites based on field work and updated citations on the flora and fauna supported at sites.”

- 4.16. In relation to the mechanisms and timescales for designation paragraph 5.16 states:

“The revisions and alterations could not be designated until they had been through a formal plan making process allowing the public and landowners the opportunity to comment. The intention was that the changes would be integrated into the 2007 LDF Core Strategy and Site Allocations document. The Hillingdon Local Plan Part 1 was published in 2012, with a review of site allocations to follow.”

- 4.17. It is entirely feasible that the existing SINC and some of the land which has been proposed under the extension of the boundary has indeed been subject to a level of “field work”. This is however not the case for the Site to which this report relates. The Site is securely fenced and at no stage has the owner been contacted with a request made for access purposes. In this light, any such survey would have been undertaken without permission being granted and with a surveyor being in no doubt as to the lack of general public access (i.e. trespass would have occurred).
- 4.18. Thus in preparing the revised citation and boundary plans there cannot be any detailed survey information on which to base the judgements being made. As demonstrated elsewhere, had surveys been undertaken the results would show that the site is not of significant nature conservation value at any level.
- 4.19. Notwithstanding that any proposal for designation of land should be based upon sound ecological survey evidence, it is possible that in this instance reliance has been based upon limited site knowledge in combination with desk based survey information. This is to say judgements have been made in relation to the Sites nature conservation value based upon the likely species composition given the habitat/s present and the connectivity to the existing SINC.
- 4.20. It is evident, given that no detailed survey could have been undertaken, that in this instance a ‘leap of faith’ has been made in relation to the quality (in nature conservation terms), of the grassland. Assumptions made in relation to habitat quality is not an acceptable approach to designation.
- 4.21. The Site is known to have been grazed through the 1980’s, 1990’s and early 2000’s. Livestock were removed in 2002 following continued instances of harming, theft and abuse. Between 2008 and 2010 the Site was subject to significant earthworks to facilitate the construction of a gas pipeline along the boundary of the site with Springfield Road. The majority of the topsoil stripped and hardstanding areas were constructed. On completion, the land was reinstated as grazing pasture over the period 2010 / 2011.
- 4.22. Given the above, any perceived nature conservation value associated with the Site at the point when the SINCs and their boundaries were being reviewed

(2005) was essentially destroyed between 2008 and 2010. Thus, events at the Site have superseded any (limited) information relied upon during the 2005 review in any event.

- 4.23. The only information which could be relied upon to support the proposed designation of the Site would need to be derived from updated and detailed survey work undertaken post reinstatement work (i.e. 2011 onwards).
- 4.24. In light of the above it is simply not possible that sufficient information has been made available to London Borough of Hillingdon in order for it to determine the quality of the Site in nature conservation terms, and to proceed to include the Site within the proposed extension to the SINC.

5. SUMMARY AND CONCLUSIONS

- 5.1. Ecology Solutions was commissioned by the owners in October 2014 to undertake an ecological appraisal, including botanical survey of a small parcel of land off Springfield Road, Hayes, Greater London. Ecology Solution was also instructed to assess the sites ecological value in the light of it being proposed to come forward as part of an extension to a SINC.
- 5.2. The ecological survey work undertaken has shown the site to be of very limited ecological value and certainly not of value in nature conservation terms at the borough wide level.
- 5.3. No detailed survey work for the Site could have been available at the time of the London SINC review in 2005, or in more recent years since no access would have been available for detailed survey unless trespass occurred.
- 5.4. The site was essentially destroyed between 2008 and 2010. Thus any information relied upon to support the revised boundary, as put forward during a 2005 review is not applicable.
- 5.5. Inclusion of the Site within the SINC does not fit with relevant designation criteria.
- 5.6. Designation of land must be fully justified and must be based upon sufficient evidence. There can be no reasonable scientific justification for including the Site within the boundaries of the proposed SINC extension.

PLANS & APPENDICES

PLANS

PLAN ECO1

Image taken from Google Earth showing the Site
location



Google earth

miles
km

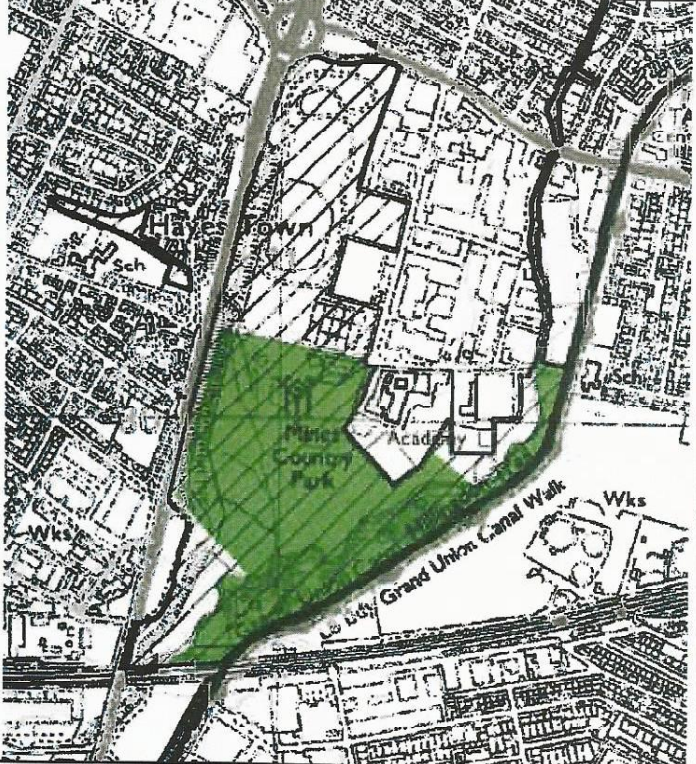


APPENDICES

APPENDIX 1

Map and citation relevant to the proposed
extension to the SINC

**GREEN BELT; METROPOLITAN OPEN LAND;
GREEN CHAINS; NATURE CONSERVATION**

Proposed extension to existing Nature Conservation Site of Metropolitan or Borough Grade I Importance	
Yeading Brook, Minet Country Park and Hitherbroom Park	Ref: SINC Ext 6
	Map Information: Clear hatched areas show proposed extension Solid green areas show existing Nature Conservation Sites of Metropolitan or Borough Grade I Importance
	Location
Grid Reference	TQ 077 916
Existing Use	Country Park
Area (ha/sqm)	21.9ha
Habitat	Secondary woodland, scattered trees, scrub planted shrubbery, hedge, herb rich & semi improved neutral grassland, amenity grassland, bare soil, roughland, tall herbs, ruderal, wet marginal vegetation, seasonal ponds, running water.
Relevant Planning History (Most recent)	None
Designations	Green Belt
Policy Considerations	Local Plan Part 1 Policy EM2: Green Belt, Metropolitan Open Land and Green Chains, Policy EM7: Biodiversity and Geological Conservation

GD/JR/DP3428/005

04 November 2014

London Borough of Hillingdon
Planning Policy Team
3N/02 Civic Centre
High Street
Uxbridge
Middlesex UB8 1UW



Dear Sir

**LOCAL PLAN PART TWO PROPOSED SUBMISSION VERSION
SITE ALLOCATIONS AND DESIGNATIONS - SEPTEMBER 2014**

**REPRESENTATIONS SUBMITTED ON BEHALF OF RED & YELLOW
IN RESPECT OF THE FORMER MEDIPARK SITE, HAREFIELD**

This representation is submitted on behalf of Red & Yellow, who have a conditional contract to purchase the site known as the former Medipark site, Harefield. We write to object to the proposed extension to the existing Nature Conservation Site of Metropolitan or Borough Grade 1 Importance located at the Medipark site, Harefield.

This designation, known as SINC Ext 11, is contained within the Proposed Submission Site Allocations and Designations document at Table 6.1 and is illustrated within the Policies Map (Atlas of Changes) at map no. 8.10. This letter, representation form and accompanying report by Biodiversity by Design relates to the Site Allocations and Designations document. A separate representation has been submitted with respect to the same designation within the Policies Map (Atlas of Changes).

Sites of Importance for Nature Conservation (SINCS) are considered to be important wildlife sites with nature conservation value. Sites of Metropolitan Importance form the top tier, and comprise the most important sites. There are approximately 140 such sites throughout London. SINCSs are chosen to represent the best wildlife habitats and have value by providing access for local communities.

Within the Proposed Submission Site Allocations and Designations document the supporting text (pages 131-132) refers to a review of SINCS in 2005, whereby the Greater London Authority undertook a review of sites and recommended a series of changes, additions and deletions to the existing designations. This work has formed the basis of the current designations being brought forward in the Local Plan Part 2.

As detailed in the report which accompanies this letter and representation form, despite efforts made by our client's ecology consultants it has not been possible to obtain a copy of the work undertaken in 2005. Neither the GLA nor the London Borough of Hillingdon have been able to produce the 2005 review upon request. It is not published as part of the Council's evidence base.



Our client has undertaken more recent survey work this year, confirming that the site is not worthy of such a designation. Full details are contained in the report which accompanies this representation.

It is therefore considered that this designation is not based upon an up-to-date evidence base and is therefore not justified, and subsequently these parts of the Local Plan are not sound.

The National Planning Policy Framework (March 2012) sets out the national policy context for decision making and plan making in the planning system. Paragraph 158 of the NPPF states that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

With respect to the environment, paragraph 165 states that *'planning policies and decisions should be based on up-to-date information about the natural environment'*. In the context of local plan examinations, the NPPF goes on to state at paragraph 182 that one of the roles of the Inspector is to assess whether the local plan is sound. This includes whether the plan is justified, and has been based on proportionate evidence.

Similarly, the Planning Practice Guidance (March 2014) states that appropriate and proportionate evidence is essential for producing a sound Local Plan. Such evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan. It is also emphasised that data should be kept up-to-date, *'for example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage)* (Planning Practice Guidance, 2014, paragraph 015).

The survey work which underpins the proposed designation dates back to 2005. It is 9 years old. It is not up-to-date and should not be relied upon to inform new designations being proposed in 2014.

We specifically refer to the report which accompanies this letter which sets out full details of the site, why the proposed designation is considered inappropriate in light of up to date evidence, and why the proposed designation should be removed from the document.

We trust that the above and enclosed representations will be taken into consideration and afforded appropriate weight in the progression of the Local Plan Part 2.

We would be grateful to receive confirmation of receipt of this representation and look forward to discussing these matters with you in due course.

Please contact Gemma Davis or Barnaby Collins of this office should you require any further information.

Yours sincerely



DP9 Ltd

cc Tamsin Leeper

Red & Yellow



HILLINGDON

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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address				2. Agent's Name and Address (if applicable)			
Title				Title			
First name				First name			
Last Name				Last name			
Organisation (if relevant)				Company			
Unit		House number		Unit		House number	
House name				House name			
Address 1				Address 1			
Address 2				Address 2			
Town				Town			
County				County			
Postcode				Postcode			
Telephone				Telephone			
Email				Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

PLEASE REFER TO ATTACHED LETTER DATED 04 NOVEMBER 2014 AND REPORT BY BIODIVERSITY BY DESIGN, OCTOBER 2014

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

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Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

IN ORDER TO FURTHER EXPAND ON THE WRITTEN REPRESENTATION SUBMITTED, ON THE BASIS OF ANY EVIDENCE PRODUCED BY THE COUNCIL AT THE EXAMINATION STAGE WHICH HAS NOT BEEN RELEASED AT THE PROPOSED SUBMISSION STAGE.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

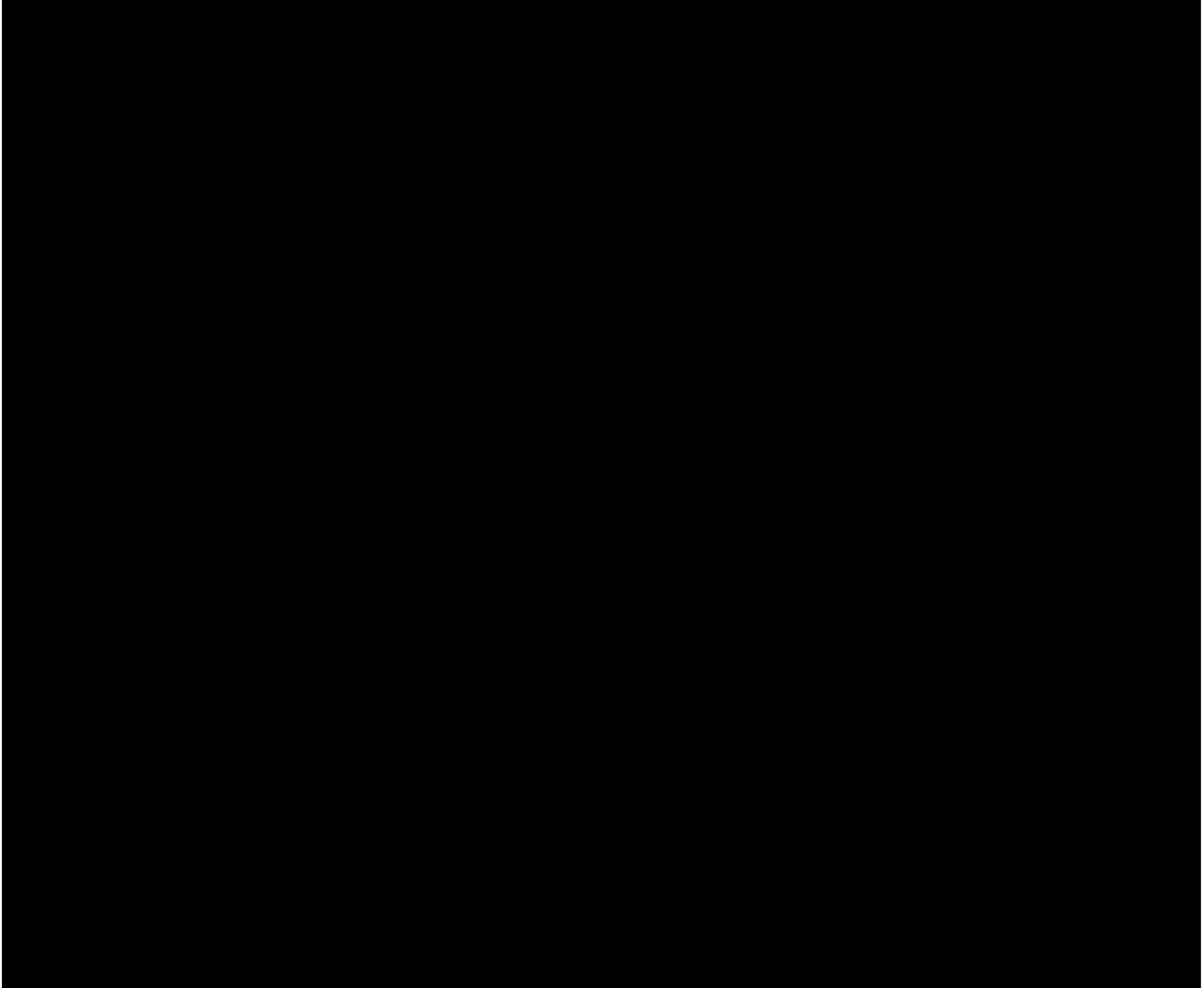
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





HILLINGDON

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	
First name	
Last name	
Company	
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

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(please tick relevant box)

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Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

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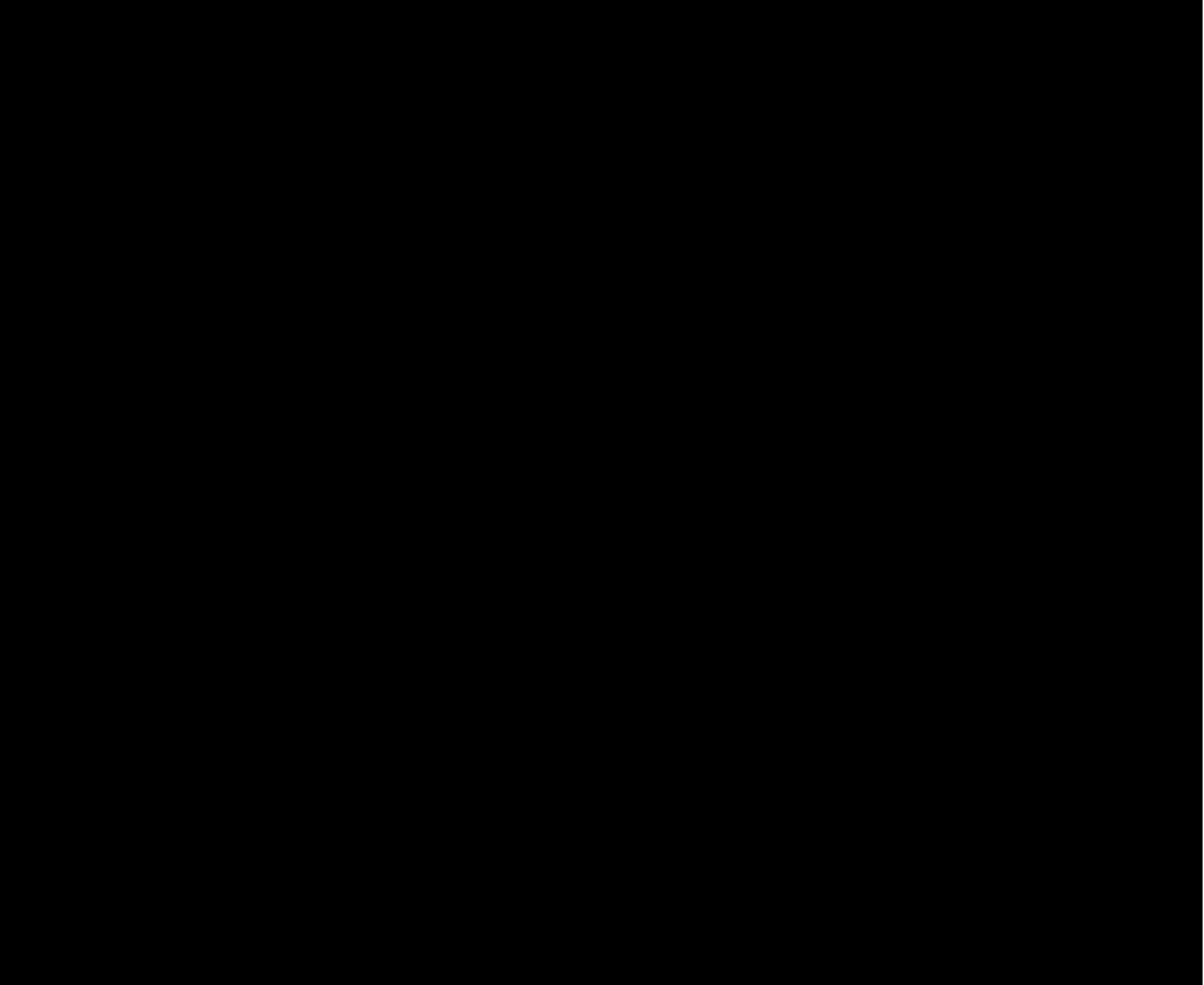
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**HAREFIELD PARK:
PROPOSED SINC DESIGNATION REBUTTAL**



On behalf of Red & Yellow

November 2014

FINAL

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1.0 INTRODUCTION

1.1 SCOPE AND AIMS

This report has been produced in response to the current public consultation on Hillingdon Local Plan: Part 2 – Site Allocations and Designations, and considers further the proposed designation of the Medipark Site as a Site of Importance for Nature Conservation (SINC).

This report reviews historical and recent ecological information for consideration in relation to this proposal, including:

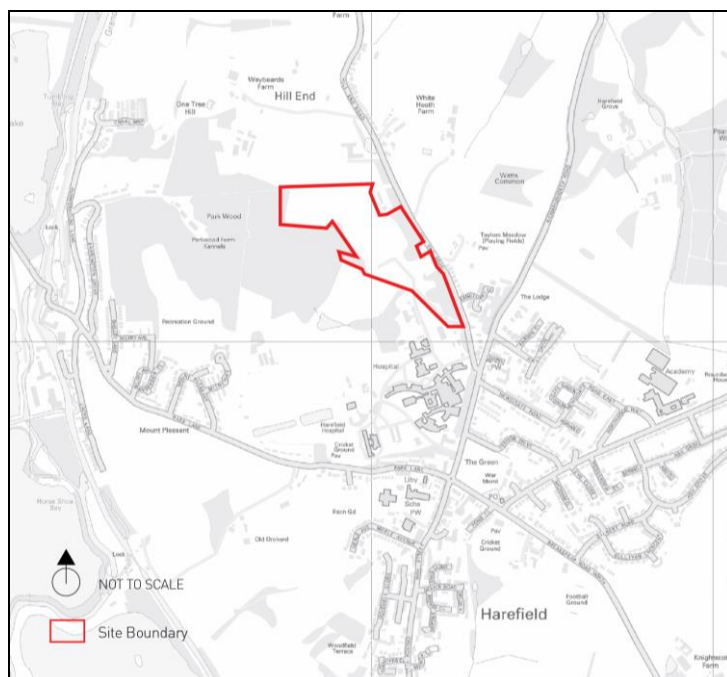
1. The current policy of relevance to the Site;
2. Survey information available for the Site, including:
 - a. Brief summary notes from the original 2005 Greater London Authority (GLA) survey information on which the initial proposal was based;
 - b. Any further historic survey information of relevance to the Site; and
 - c. The most recent detailed survey information relating to the Site undertaken between 2012 and 2014.
3. A review of the SINC selection process and the roles and responsibilities associated.

1.2 THE SITE

The former North Wards/Medipark Site Hill End Road, Harefield, UB9 6JH (hereafter referred to as 'the Site') is c. 8.8 hectares (ha) in size, and lies to the north of Harefield Hospital.

The Site has a history of providing care facilities: in the early 20th century, the Site was developed as a Tuberculosis Sanatorium, which was then expanded through 1920's and 30's. Further development during WWII extended the capacity to in excess of 300 beds. In the 1980's, all the existing buildings on the Site were demolished in advance of the Medi Park proposal granted consent in 1991. In 2010, vegetation was cleared from the Site.

Figure 1.1: Site Location Plan



1.3 PROPOSED DESIGNATION

Based on the consultation undertaken in the preparation of this present report, it is understood that habitat survey undertaken by the GLA Ecology Unit in 2005, (as a part of the London-wide programme of habitat survey), formed the evidence base for the recommendation that the Site be considered for designation as a SINC within ensuing local planning policy.

The London Borough of Hillingdon Unitary Development Plan was adopted in 2007. Policies adopted were ‘saved’ from the 1998 Local Plan, no new policies were put forwards and no changes were made to the allocation plan. Consequently, the current consultation on Part 2 of the Hillingdon Local Plan represents the first opportunity that Hillingdon Borough Council have had to propose new SINC’s since the 2005 GLA survey.

1.4 POLICY BACKGROUND

Relevant sections of the Hillingdon Local Plan are as follows:

- The Hillingdon Local Plan: Part 1 – Strategic Policies. Hillingdon Local Plan: Part 1 - Strategic Policies (previously known as the ‘Core Strategy’) was adopted on 8th November 2012 and sets out the key elements of the planning framework for the borough over the next 15 years.


Of particular relevance to this report is Policy EM7: Biodiversity and Geological Conservation states that: *‘The Council will review all the Borough grade Sites of Importance for Nature Conservation (SINC’s). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be*

based on previous recommendations made in discussions with the Greater London Authority.’

- The Hillingdon Local Plan: Part 2. The Council has prepared a Proposed Submission version of the Local Plan: Part 2 comprising the following:
 - Development Management Policies;
 - Site Allocations and Designations; and
 - Policies Map.

The Local Plan: Part 2 includes the proposed extension to the existing Old Park Wood Site of Metropolitan Importance for Nature Conservation (SMINC) contained within the Site Allocations and Designations document. This proposal, which effectively sets out the intended designation of the Site as a SMINC or Site of Borough Importance for Nature Conservation (Grade I) (SBINC I), is reproduced in Plate 1.1.

Plate 1.1: Proposed Extension to existing Nature Conservation Site of Metropolitan or Borough Grade I Importance

Proposed extension to existing Nature Conservation Site of Metropolitan or Borough Grade I Importance	
Medipark Site, Harefield	
Ref: SINC Ext 11	
	
Map Information:	
Clear cross hatched areas show proposed extension	
Solid green areas show existing Nature Conservation Sites of Metropolitan or Borough Grade I Importance	
Solid yellow areas show existing Nature Conservation Sites of Borough Grade 2 or Local Importance	
Location	North West of Harefield
Grid Reference	TQ 050 912
Existing Use	Open Land
Area (ha/sqm)	0.79ha
Habitat	Neutral and calcareous grassland, secondary woodland, ruderal roughland, bare artificial, native broadleaved woodland.
Relevant Planning History (Most recent)	Applications for track improvements
Designations	Colne Valley Regional Park, Green Belt
Policy Considerations	Local Plan Part 1 Policy EM2: Green Belt, Metropolitan Open Land and Green Chains, Policy EM7: Biodiversity and Geological Conservation

Initial Council Cabinet consultation of the Part 2 component documents, including the Site Allocations and Designations documents containing the aforementioned proposal, was carried out during April – May 2013 in line with Regulation 18 of the Town and Country Planning (Local Plan) (England) Regulations. Further consultation under Regulation 19 of the Town and Country Planning (Local Plan) (England) Regulations is on-going and is due to cease on 4th November 2014.

Following the conclusion of this process the documents will be submitted to the Secretary of State for Communities and Local Government for independent examination. Further details

relating to the Site Allocations and Designations document are provided within Section 4, with supplementary policy information provided within Appendix A.

1.5 CONSULTATION

A number of organisations were contacted by Biodiversity by Design (on behalf of Red & Yellow), in order to obtain any relevant information relating to:

- the evidence base for the proposed SINC designation; and
- methodologies /selection criteria employed by Hillingdon Borough Council for assigning SINC designations.

Table 1.0 below sets out the organisations contacted and the responses gained:

Table 1.0: Summary of Consultation

Contact	Date	Response
Peter Massini <i>GLA and contact for the London Wildlife Selection Board</i>	6 th Oct - 7 th Oct 2014	PM issued the HiBI15 Citation document (as shown in Section 2.0) and recommended that any further information relating to the Site would need to be obtained from GiGL.
	17 th Oct 2014	PM confirmed that the 2004 data held by GiGL is probably the most up to date data for the Site and that the 2005 GLA SINC's consultation report was based on the 2004 habitat survey data. PM also confirmed that GLA no longer hold the original survey data nor do they hold more recent habitat data. PM confirmed that updating habitat data to ensure LDF's are based on sound evidence is a Borough responsibility.
Maria Longley <i>Greenspace Information for Greater London (GiGL)</i>	6 th Oct - 7 th Oct 2014	ML confirmed that GiGL do not often see reports which are created to recommend a SINC site and usually only receive a citation and site boundary from the Borough once a site is adopted. ML further confirmed that GiGL do not hold the original survey data and that any habitat survey data held by GiGL would have been provided within the desk study report produced to inform the ecology planning application report (see Biodiversity by Design, 2014: Harefield Park Ecological Appraisal Report for further details). ML confirmed that in this instance the GLA led on the survey work and the recommendations and would therefore be more likely to hold the information recommending that Peter Massini and subsequently Stuart Hunt (Trees and Woodland Manager) at Hillingdon Borough Council were contacted.
	23 rd Oct 2014	By phone: ML confirmed that Borough's now designate their own SINC's. If they want to, they can present their information to the Wildlife Selection Board although this is not obligatory. The Borough itself then determines what is included within the LDF. ML confirmed that, to date, Hillingdon Borough Council have not presented their information to the Wildlife Selection Board.
Ian Thynne and	7 th Oct - 10 th	IT issued the HiBI15 document [as previously received from Peter Massini] and confirmed that there was a report which was a GLA

<p>Stuart Hunt</p> <p><i>Hillingdon Borough Council (HBC)</i></p>	<p>Oct 2014</p>	<p>commissioned review with assistance from Hillingdon but confirmed that the records held by Hillingdon did not provide any further information.</p> <p>IT then went on to recommend contacting Peter Massini.</p>
	<p>23rd Oct 2014</p>	<p>By phone:</p> <p>IT acknowledged that a citation cannot be based on 2005 data and therefore, if sufficient evidence is provided to confirm that the habitat has significantly changed and is therefore no longer considered to be of the level of importance that it was previously, citation may not be possible.</p> <p>IT confirmed that many of the proposed sites are owned and managed by Hillingdon but that the Medipark site is not. This means that where up to date info is gathered for a number of other sites on a regular basis, there is no further data than the 2005 GLA data.</p> <p>IT confirmed that the selection criteria for these sites was subjective and made by the officer at the time of the assessment, i.e. 2005 in the case of this site.</p> <p>IT noted that this site is still located within the green belt which has a high level of importance.</p>

1.6 DATA SOURCES

1.6.1 Historic Data

Although it is understood that the GLA survey data formed the evidence base for the proposal of this site as a SINC, despite extensive consultation with all potential holders of this information (see Table 1.3 above), it has not proved possible to obtain any survey data, reporting or assessment of the ecological interests of the Site leading to its proposed designation.

In addition to the above consultations, historic data was requested and obtained from the following organisations as part of the current planning application report:

- Greenspace Information for Greater London (GiGL) – the environmental records centre for London;
- London Mammal Group;
- London, Essex and Hertfordshire Amphibian and Reptile Group; and
- London Bat Group.

1.6.2 Current Baseline

To inform the current planning application for the Site (69751/APP/2014/2906), the following field surveys were completed during 2013 - 2014¹:

- National Vegetation Communities (NVC) surveys;
- Invertebrate surveys;
- Amphibian surveys;
- Reptile surveys;
- Bird surveys;
- Bat surveys; comprising:
 - Transect Activity Surveys;
 - Automated Bat Detector Surveys;
 - Tree Assessments; and
 - Dusk/ Dawn Surveys for High Potential Trees.
- Badger surveys.

Further details are provided within Biodiversity by Design, 2014: Harefield Park Ecological Appraisal Report.

2.0 HISTORIC BASELINE

It is understood that GLA Ecology Unit surveyed the Site in 2005 and although no detailed survey information or evidence base for the designation proposal has been made available for review (as outlined above), the following citation (Table 2.0 below – obtained during consultation from Peter Massini [GLA] & Ian Thynne [HBC]) has been widely circulated as a summary of the habitat information for the Site, last updated in 2005 following the GLA survey.

¹ Badger survey was undertaken as a part of the preliminary site inspection carried out in January 2011. All parts of the Site were accessed, and signs of use by badgers (such as setts, dung pits/latrines, hairs and tracks) were searched for. Field signs of mammals (including badger and hedgehog) were also searched for on an ongoing basis as incidental observations during other surveys to the Site.

Table 2.0: Proposed SINC Citation: Medipark Site

Site of Importance for Nature Conservation: Hi BI 15: Medipark Site, Harefield			
Grid ref:	TQ050 912	Area (ha):	8.04
Borough:	Hillingdon		
Site first notified:	08/07/2002	Boundary last changed:	8/7/02
Citation last edited:	23/2/05		
Habitat:	Neutral and calcareous grassland, secondary woodland, ruderal, roughland, bare artificial, native broadleaved woodland.		
<p>An interesting mosaic of habitats has developed within the former grounds of a demolished hospital building, including species-rich neutral to calcareous grassland, scrub and some marginal secondary woodland. The best of the grassland supports a sizeable population of bee orchid (<i>Ophrys apifera</i>), as well as occasional pyramidal orchid (<i>Anacamptis pyramidalis</i>), common broomrape (<i>Orobanche minor</i>), glaucous sedge (<i>Carex flacca</i>), grass vetchling (<i>Lathyrus nissolia</i>) and dwarf gorse (<i>Ulex minor</i>), all regionally restricted plants of local distribution within the borough. The secondary woodland consists mainly of oak (<i>Quercus robur</i>) with some beech (<i>Fagus sylvatica</i>) and common hawthorn (<i>Crataegus monogyna</i>), and a ground flora of bramble (<i>Rubus fruticosus</i>) and bluebell (<i>Hyacinthides non-scripta</i>). The invertebrate fauna is likely to be of interest and includes both marbled white and common blue butterflies, as well as the nationally scarce Roesel's bush-cricket (<i>Metricoptera roeselii</i>).</p> <p>There is no public access.</p> <p>This site has been identified since the adoption of the Supplementary Planning Guidance in 1994.</p>			

This proposed SINC citation for the Site, (which it is understood is based on the 2005 GLA survey data) suggests that the interest features leading to the proposal for designation were:

- The mosaic of habitats present, including species-rich grassland, scrub and secondary woodland;
- the presence of plants with a regionally restricted distribution; and
- the presence of a nationally scarce invertebrate.

Further data for the Site (obtained from GIGL) included habitat data which is derived from field surveys undertaken as a part of a London-wide rolling programme of habitat inventory. These data included habitat classifications for the Site as follows:

Table 2.1: Summary of GIGL Habitat Data

Habitat Parcel	Information Date	Location on Site	Habitat Types	Habitat Size
26111/02	2004	Along eastern edge of the Site	Native broad-leaved woodland	2.22ha
26469/01	2004	Main area of the Site	Roughland (intimate mix of 9 [Neutral grassland], 14 [Tall herbs] and 06 [scrub] ²) Bare artificial habitat	6.40ha 0.71ha

Further details are provided within Biodiversity by Design, 2014: Harefield Park Ecological Appraisal Report.

3.0 CURRENT BASELINE

3.1 HABITATS

A detailed botanical survey of the Site was carried out over the summer of 2013. The aim of the survey was to identify all habitats on site in accordance with the Handbook for Phase One Habitat Survey (JNCC 2010) and identify communities and sub-communities within those habitats in accordance with NVC methodology.

The results of the survey concluded that habitats were of up to Local value.

Further details are provided within Biodiversity by Design, 2014: NVC Report with a summary of results provided below.

3.1.1 Grassland

The grasslands on this site were mesotrophic and ranged from species-poor swards through to relatively species rich semi-improved neutral grassland. The most species-rich sward was found towards the north of the Site which supported a relatively species-rich MG6b community, although no species of rarity or nature conservation importance were recorded here.

Other grasslands in the centre of the Site were also semi-improved neutral grassland but appeared to be slightly lower in both species richness and the abundance of the more notable herbs. No species of particular note or locally restricted distribution were found.

None of the grasslands present were considered to meet the definitions of Habitats of Principle Importance (HPI)/Priority Habitat types.

Although of some botanical interest these grasslands were considered unlikely to be of value at more than the **Local** scale.

² 9: Neutral grassland – semi-improved: mesotrophic grassland, usually with one or more *Arrhenatherum elatius*, *Deschampsia cespitosa*, *Alopecurus pratensis*, *Cynosurus cristatus*, *Dactylis glomerata*, *Festuca arundinacea*, or *F. pratensis*. Contains more than just *Lolium perenne*, *Trifolium repens*, *Rumex acetosa*, *Taraxacum*, *Bellis perennis* and *Ranunculus sp.* but lacks the characteristic forbs of herb-rich neutral grassland.

14: Tall herbs: Stands of tall non-grass herbaceous species, often rhizomatous perennials, such as *Fallopia japonica*, *Conium maculatum*, *Chamerion angustifolium*, *Anthriscus sylvestris*, *Urtica dioica*, *Epilobium hirsutum*, *Solidago Canadensis* and species of *Aster* and *Heracleum*.

16: Scrub Dominated (at least 75% cover) by shrubs (usually less than 5 metres tall), excluding fen carr (19), heathland (15), young woodland, coppice, hedges (25, 34) and planted shrubberies (38). Includes stands of hawthorn, hazel (except coppice with standards), elder and *Salix cinerea*, *caprea* and *viminalis* regardless of height.

3.1.2 Woodland

The woodlands on Site were not found to hold any botanical species of note. A W10e woodland is representative of many such semi-mature semi-natural woodlands across south-east England that grow over mildly acidic substrates.

The definitions for the Lowland Mixed Deciduous Woodland HPI/Priority Habitat are very broad, and accordingly, these areas of woodland do fall under the definition of the HPI. Despite this, they are very small, suffer from an absence of management display poor habitat structure and diversity. Accordingly, woodland on Site is considered to be of value at the **Local** scale.

3.1.3 Tall Ruderal and Ephemeral /Short Perennial

These habitats were limited to narrow fringes of the Site and small areas associated with the broken tarmac/hard standing remaining from the site demolition and clearance in the past.

The only species of comment within these habitats were Squirrel-Tail and Rat's-tail Fescues (recorded in the ephemeral / short perennial habitat). These species are largely restricted to brownfield or urban situations, but are relatively widespread and locally common species. With the exception of these two grasses these habitats supported no species of note and are likely to be of value only in a **Site** context (**Zone of Influence**).

3.2 SPECIES:

Key findings of surveys conducted in 2013/2014 are summarised below, for full methodologies, results and discussion, refer to the following baseline reports:

- Biodiversity by Design (2014): Invertebrate Survey Report;
- Biodiversity by Design (2014): Great Crested Newt Report;
- Biodiversity by Design (2014): Reptile Report;
- Biodiversity by Design (2014): Breeding Birds Report; and
- Biodiversity by Design (2014): Bat Survey Report.

3.2.1 Invertebrates

Surveys identified 276 species of invertebrate including one 'Species of Principal Importance' (SPI): the Cinnabar moth *Tyria jacobaeae*. When listed on the UK Biodiversity Action Plan (BAP) (now superseded by Section 41 of the NERC Act), this species was listed as a "research-only" BAP species, being still widespread and common, although thought to be declining. Conservation action for "research only" BAP species was focused on further research rather than protection of individual sites.

One species in the highest conservation status categories (RDB and Threatened) was found during this survey. Normally, the presence of such species is indicative of a site with some importance at national level, however in this case the RDB species concerned, *Rhingia rostrata*, is one that has become more widespread in recent years and no longer merits RDB status (Ball and Morris, 2012).

10 further 'Key Species' (officially listed as having rare or scarce conservation status) were also identified. In the experience of the surveyor, this proportion of 'Key species' is substantially lower than is typically found on regionally comparable sites.

The results of this survey indicate that the Harefield survey area is of only **Local** importance for invertebrate conservation.

3.2.2 Amphibians

No suitable amphibian breeding habitat was noted within the Site; however, surveys revealed the presence of Great Crested Newts in and around four ponds within 500m of the Site. No evidence was obtained that terrestrial phase GCNs made use of the Site, and the current short-sward grassland management was judged to limit the suitability of the grasslands for use by foraging GCN.

3.2.3 Reptiles

Grass Snake were identified on the Site during the surveys. This is considered to represent a breeding population that is of value at the **Local/District** scale, which uses habitats present on the site as a part of the home range.

3.2.4 Breeding Birds

The survey recorded a total of 54 bird species, including species only seen flying over the survey area.

Seven SPI were recorded, six of which are also Red List species (Eaton et al. 2009). Of these seven species, Song Thrush was found to be probably breeding on the survey area, Bullfinch was found to be possibly breeding on the survey area, Marsh Tit was found to be foraging on the survey area in a post-breeding flock, and the remainder were not breeding on the survey area. Overall, the species assemblage at the Site is considered to be of value at a **Local** scale.

3.2.5 Bats

Foraging/commuting

The transect surveys confirmed at least five bat species using the site. These were Common Pipistrelle, Soprano Pipistrelle, Serotine, Noctule and at least one Myotis species.

Application of the approach identified by Wray et al. (2010) for determining a score for bat habitat values for commuting and foraging, along with the CIEEM criteria (CIEEM 2006) for assessing ecological value, the cumulative value of the site for the bat assemblage (all species) is considered to be at the **Parish/Local** level of importance.

Roosting

No evidence of roosting bats was noted, and accordingly the Site is assessed to be of **Negligible** value to roosting bats.

3.2.6 Other Mammals

A disused Badger outlier sett was identified within the woodland during the preliminary site survey in 2011.

Occasional signs of badger activity (single dung-pit and signs of foraging activity) were noted on the site over the two year course of surveys of the Site, all from along the western boundary of the Site with the SSSI.

No observations or field signs of Hedgehog were noted during the course of surveys.

The Site is assessed to have value at no more than the **Zone of Influence** scale for badger.

3.3 SUPPORTING FUNCTION TO SSSI

Areas adjacent to sites of conservation interest such as SSSIs can provide supporting functions to the interest features of these sites. Such supporting functions can include providing habitat connectivity/wildlife corridors, buffer zones, increasing contiguous habitat areas and reducing edge effects.

The Old Park Wood SSSI is primarily designated for its rich ancient woodland habitats and flora. Habitats within the Site do include woodlands but are primarily open grassland (particularly where directly adjacent to the SSSI). Accordingly, the Site does not provide functions such as increasing contiguous habitat area, reducing edge effects or key supporting habitats for SSSI interest features.

The preservation of buffer zones, wildlife corridors and supporting habitats to sites of conservation interest is not dependant on the designation of adjacent land as SINC, and proximity to such a site alone cannot be a sole criteria for designation. Local and national planning policies and guidance make substantial requirements for the maintenance and protection of supporting functions for SSSIs through the planning process, for example requiring appropriate consideration of landscape connectivity and green infrastructure, provision of buffer zones and habitat creation and management.

While it is therefore recognised that the Site does provide some level of supporting function to the Old Park Wood SSSI, maintaining the integrity of the SSSI and its interest features does not depend on the designation of the Site.

3.4 HABITATS AND FLORA

The mosaic and quality of habitats present would appear to have reduced since the 2005 GLA survey.

Surveys undertaken in 2014 identified that, while there was some variability across the Site, none of the grasslands present were particularly species rich in their own right.

Of the regionally restricted plants that are listed as present in the proposed SINC citation, none were found to be present during the surveys conducted in 2014. No other plants of particular note were identified.

The 2005 survey identified the majority of the Site to be 'roughland', which is described as an intimate mixture of semi-improved grassland, tall herb and scrub. The 2014 surveys found

that areas of tall ruderal vegetation and scrub were small in size, sparse and restricted to the margins of the Site, with the vast majority of the Site comprising mown grassland.

It is understood that significant parts of the Site were cleared of vegetation in early 2010. Subsequent to this, open areas of the Site have been regularly mown and managed as a short sward grassland. This vegetation clearance and subsequent management are considered to have resulted in the disparity between the current and the historical baselines.

3.5 SPECIES

The 2005 survey data obtained identified only that Roesel's Bush Cricket was present on the Site, and that it was also likely to support an interesting invertebrate assemblage.

Roesel's Bush Cricket was formerly restricted to a small area of south-east England centred on the coasts of the Thames Estuary. Roesel's Bush Cricket has undergone a dramatic and rapid range expansion in recent decades, and no longer deserves to be treated as a Nationally Scarce species, although until the conservation status of Orthoptera species are revised, this remains its official status.

Detailed surveys in 2013/14 did confirm the presence of Roesel's Bush Cricket, along with 9 other 'key species', together taken to be a relatively low proportion of the total assemblage in comparison with other regionally similar sites.

Detailed surveys in 2013/14 did not reveal the presence of any other species or assemblage of particular conservation note at frequencies of particular conservation significance.

4.0 SUMMARY OF SINC DESIGNATION CRITERIA

Table 5.0 below sets out a summary of the outline criteria identified for consideration (*Advice Note: Process for Selecting and Confirming SINC's in Greater London*. London Wildlife Sites Board 2013) when proposing the designation of a SINC. This advice note goes on to highlight that individual Boroughs should develop their own quantified criteria based on these to reflect the varied nature and values of wildlife and habitats within Greater London.

In the absence of detailed and quantified criteria, these outline criteria have been considered in relation to the current ecological baseline of the Site.

Table 5.0: Summary of Criteria for Proposing SINC's

Criteria	Description (as published within Advice Note: Process for Selecting and Confirming SINCs in Greater London)	Consideration in Relation to the 2014 Baseline
Representation	The best examples of each major habitat type are selected. These include typical urban habitats such as abandoned land colonised by nature ('brownfield'). Where a habitat is not extensive in the search area it will be appropriate to conserve all or most of it, whereas where it is more extensive a smaller percentage will be conserved.	<ul style="list-style-type: none"> Although of some botanical interest, as the semi-improved grassland on site was considered to be of Local value only, it is considered unlikely to be one of the 'best examples' within the Borough. Data from GIGL indicates that there is c.990ha of unimproved or semi-improved grassland habitat present within the London Borough of Hillingdon, of which 963ha comprise neutral grassland. The 5.5 ha of semi-improved grasslands (comprised of 3.0ha of semi-improved neutral grassland and 2.5ha of semi-improved species-poor grassland) present on the Site therefore represent less than 0.6% of the total resource of this habitat in the borough and consequently would not represent a significant loss (in the context of the borough) if damaged. Although habitat data obtained from GiGL does not specify the habitat quality of each parcel surveyed, and therefore whether it is one of the 'best examples' in the Borough, this habitat type is considered relatively extensive; and as such further representation within designated sites should not be a pre-requisite of their designation.
Habitat Rarity	The presence of a rare habitat makes a site important, because the loss of, or damage to, only a few sites threatens the survival of the habitat in the search area.	<ul style="list-style-type: none"> The Site comprises grassland, woodland, tall ruderal and ephemeral/ short perennial habitats of up to Local value.
Habitat Richness	Protecting a site with a rich selection of habitat types not only conserves those habitats, but also the wide range of organisms that live within them and the species that require more than one habitat type for their survival. Rich sites also afford more opportunities for enjoyment and educational use.	<ul style="list-style-type: none"> The woodland and grassland habitats on the Site comprised NVC communities that are common across southern England. They are likely to have local value but not regional or national value. The tall ruderal and ephemeral /short perennial habitats are of Site interest only and are unlikely to have even local value. Although of some botanical interest, the semi-improved grassland habitat is considered fairly extensive across the Borough and as such, is not considered a rare habitat. Woodlands present are also considered to be relatively depauperate examples.
Species Rarity	The presence of a rare species makes a site important in a way that parallels rare habitat.	<ul style="list-style-type: none"> Detailed surveys in 2013/2014 did not reveal the presence of any species or assemblage of particular significance at the Borough scale.
Species Richness	Generally, sites that are rich in species are to be preferred, as this permits the conservation of a correspondingly large number of species. However, some habitats, such as reed beds, heaths and acid woodlands, are intrinsically relatively poor in species.	<ul style="list-style-type: none"> Habitats on-site support a reasonable variety of species typical of the habitats present. Detailed surveys did not detect the species richness to be of particular note for any tax surveyed.

Size	Large sites are usually more important than small sites. They may allow for species with special area requirements. Large sites may be less vulnerable to small-scale disturbance, as recovery is sometimes possible from the undisturbed remainder. They are also more able to withstand visitors, by diluting their pressure within a wider space. Size is also related to the richness of habitat and species, and so is used as a surrogate for these other two criteria where information is incomplete.	<ul style="list-style-type: none"> At c8.8 ha in size, the Site is not of particularly large size. Given the level of detailed survey undertaken, size criteria should not be as a surrogate for richness and diversity.
Important Populations of Species	Some sites are important because they hold a large proportion of the population of a species for the search area (eg waterfowl populations or colonial birds such as herons or jackdaws).	<ul style="list-style-type: none"> Detailed surveys of the Site did not detect that it supports a large proportion of an important population of any given species.
Ancient Character	Some sites have valuable ecological characteristics derived from long periods of traditional management, or even a continuity in time to the woodlands and wetlands which occupied the London area before agriculture. Ancient woodlands, old parkland trees and traditionally managed grasslands tend to have typical species that are rare elsewhere. These habitats deserve protection also because of the ease with which they are damaged by changes in management, ploughing, fertiliser and herbicide treatment.	<ul style="list-style-type: none"> The Site has a varied history which includes having been previously developed during World War 1, when a series of hospital ancillary accommodation and facilities were progressively built across the site. These facilities were expanded on during World War 2 by which time dense inter-linked buildings covered a large portion of the Site. Buildings on the Site fell into disuse and were eventually demolished during the 1980s. In more recent times, open areas of the Site have been regularly mown and managed as a short sward grassland. The Site is therefore not definable by its traditional management or ancient character.
Recreatability	Habitats vary in the ease with which they can be recreated and the length of time required; for example ponds can be created from scratch with reasonable success within a few years, but woods not only take much longer - at least decades - to mature, but even then they do not contain the same flora and fauna as ancient woods on undisturbed soils. In addition to the ecological reasons why certain habitats cannot be recreated, many sites are not capable of being recreated because of practical reasons such as land availability and cost. The more difficult it is to recreate a site's habitats the more important it is to retain it.	<ul style="list-style-type: none"> Woodland habitat on the Site is semi-mature and hence of low recreatability within a short – medium timescale; Given the site's history (including having been partly previously developed) the majority of habitats present (semi-improved grassland, tall ruderal and ephemeral/ short perennial) on the Site are relatively easily recreatable.
Typical Urban Character	Features such as canals, abandoned wharves, walls, bridges, tombstones and railway sidings colonised by nature often have a juxtaposition of artificial and wild features. Some of these habitats are particularly rich in species and have rare species and communities of species. Their substrates may have a particular physical and chemical nature which allows species to thrive that are rare elsewhere. They may also have particular visual qualities. Such areas are often useful for the study of colonisation and ecological succession.	<ul style="list-style-type: none"> The Site does not include these types of features.
Cultural or Historic Character	Sites such as historic gardens with semi-wild areas, garden suburbs, churchyards and Victorian cemeteries which have reverted to the wild may have a unique blend of cultural and natural history.	<ul style="list-style-type: none"> The Site does not include these types of features.

Geographic Position	This criterion is operated through the use of search areas and areas of deficiency	<ul style="list-style-type: none"> The Site is currently private with no formal public access.
Access	Access is an important consideration, especially in areas where there may be few places for large urban populations to experience the natural world. Nature conservation is not restricted to the preservation of wildlife, but goes hand in hand with the enjoyment of it by all people, from the specialist naturalist to the casual visitor. Some access is desirable to all but the most sensitive of sites, but direct physical access to all parts of a site may not be desirable.	<ul style="list-style-type: none"> The Site is currently private with no formal public access
Use	The importance of a site can include its established usage (eg for education, research, or quiet enjoyment of nature).	<ul style="list-style-type: none"> The Site is currently private with no formal public access
Potential	Where a site can be enhanced given modest changes in management practices this gives it value. Opportunity exists where a site is likely to become available for nature conservation use, or where there is considerable local enthusiasm about it, or where a voluntary group is willing to use and manage it. Potential in this context can be for habitat enhancement through management, for educational or nature conservation amenity use. Where such potential could remedy a deficiency, or is readily capitalised, it is considered important.	<ul style="list-style-type: none"> Given that the Site is privately owned, it is unlikely to become solely available for nature conservation use. Its potential for enhancement through habitat creation, management and formalization of public access could only realistically be achieved through change of use and ownership.
Aesthetic Appeal	This factor is the most difficult to measure, but it includes such factors, which contribute to the enjoyment of the experience of visiting a site, as seclusion, views, variety of landscape and habitat structure, colour, and natural sounds and scents.	<ul style="list-style-type: none"> The Site is currently private with no formal public access
Geodiversity Interest	Where a site has a geological interest which has educational, scientific, historical or aesthetic interest as set out in London's Foundations (2009)	<ul style="list-style-type: none"> The Site does not include these types of features.

5.0 CONCLUSIONS

- It is understood that the designation proposal was based on surveys undertaken in 2005, the results of which are no longer available, and the evidence base for the proposed designation is solely the proposed SINC citation.
- In accordance with the methodology as set out in *Advice Note: Process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London (March 2013)* (Appendix 7), the more recent data for the Site collected in 2013/14 supersedes this and should be used to inform its suitability for designation.
- In line with the Advice Note, all surveys completed between 2011 and 2014 to support the current planning application were completed by members of the Chartered Institute of Ecology and Environmental Management.
- From the historic survey data that has been obtained, it would appear that the proposed SINC designation of the Site is based on a subjective assessment of broad-

scale survey data collected during or prior to 2005. Ecological features that it appears this may have been based on were:

- Presence of a species-rich neutral / calcareous grassland supporting a number of locally restricted plant species;
 - Presence of a mosaic of habitat types associated with the species-rich grassland, including; scrub, broad-leaved woodland, tall herbs, scattered trees, broad-leaved woodland, 'roughland' and bare artificial habitat;
 - Presence of Roesel's Bush Cricket, as well as (suspected) other invertebrate fauna of interest; and
 - Proximity to Old Park Wood SSSI/Metropolitan SINC.
- Vegetation clearance and management, have resulted in a reduction in the diversity and quality of habitats present when compared to the features and habitats that were present prior to 2005.
 - The conservation status of certain invertebrates present (including Roesel's Bush Cricket) have changed substantially, due to range expansion and greater understanding of distributions to the extent that their formal conservation listing is no longer supported by their current distributions and increasing abundances.
 - Detailed surveys of the site have not detected the presence of particularly noteworthy populations of species of conservation concern.
 - Surveys did not identify the Site to play a critical supporting role to the conservation integrity of the SSSI or its interest features, and supporting functions that are provided are considered to be adequately protected through other planning policy without requiring SINC designation to secure
 - Subjective consideration of the Site against broad qualitative criteria for SINC designation (London Wildlife Sites Board, 2013) do not highlight particular justification for designation of the Site

Taken together, it is considered that the result of ecological surveys undertaken in 2013-2014 do not support the proposed designation of the Site as a Metropolitan or Borough Grade 1 SINC.

6.0 APPENDIX A: BACKGROUND INFORMATION

6.1 LONDON BOROUGH OF HILLINGDON (2014). LOCAL PLAN PART 2: PROPOSED SUBMISSION VERSION: SITE ALLOCATIONS AND DESIGNATIONS SEPTEMBER 2014.

6.1.1 Sites of Importance for Conservation

In 1985, the London Ecology Unit published guidelines (Ecology Handbook 3) on the procedure for identifying sites for nature conservation protection. This procedure would help London Boroughs identify different grades of 'Sites of Importance for Nature Conservation' (SINCS). The grades of SINCS were:

- *Metropolitan*
- *Borough*
- *Local*

These sites would supplement those designated at a national and international level. Protection would be commensurate with the grade of protection.

In 1988, the London Ecology Unit in combination with the London Borough of Hillingdon produced Ecology Handbook 7 which presented all the sites worthy of nature conservation in the borough. It followed the format of Ecology Handbook 3 but separated Borough SINCS into Grade 1 (highly important) and Grade 2 (of less importance). The identification of sites was based on extensive site and field surveys with acknowledgement of the types of habitat and species supported.

The SINCS did not become formal designations until they had been formally adopted through a plan making process. The London Ecology Unit adopted the policy for selecting sites in the 1996 Regional Planning Guidance which supported the designation of sites in Unitary Development Plans. As a consequence, the sites selected in the Ecology Handbook 7 (1988) were only formally designated in the 1998 Unitary Development Plan.

The move from UDP to Local Development Framework (LDF) prompted a review of SINCS in 2005. The GLA in combination with the Borough carried out an extensive review of sites based on field work and updated citations on the flora and fauna supported at sites. The outcome was a series of boundary changes, some additions, and deletions where sites were lost as a result of development. The revisions and alterations could not be designated until they had been through a formal plan making process allowing the public and landowners the opportunity to comment. The intention was that the changes would be integrated into the 2007 LDF Core Strategy and Site Allocations document. The Hillingdon Local Plan Part 1 was published in 2012, with a review of site allocations to follow.

The Council intends to take forward the SINCS outlined in Ecology Handbook 8 together with the revisions and deletions recommended in the 2005 updated survey. The proposed SINCS are accompanied by a citation of their special features and an outline of the site boundary.

It should be noted that the GLA had been responsible for designating Metropolitan Sites of Nature Conservation which were formalised through the 2004, 2008 and 2011 London Plan.

This responsibility has now been passed to London Boroughs to designate Metropolitan Grade sites.

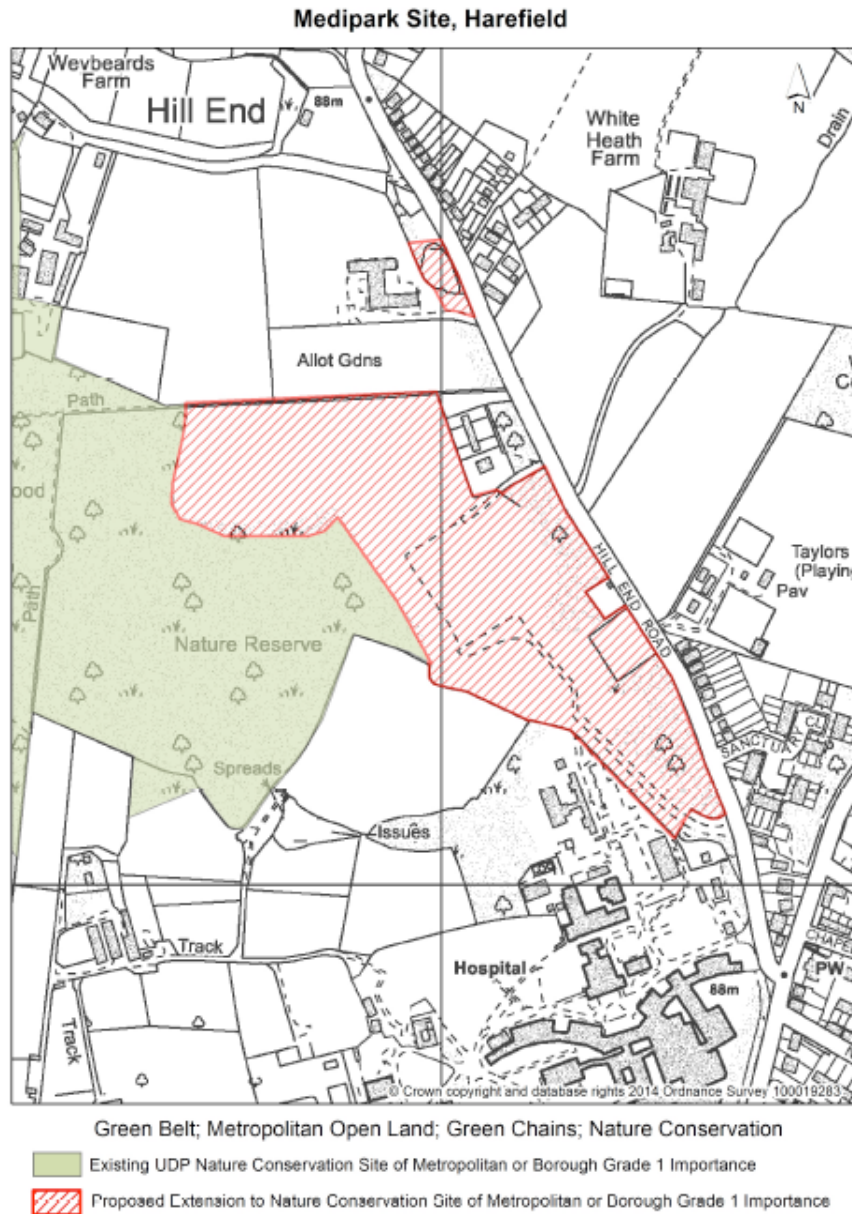
One site of Nature Conservation Metropolitan or Borough Grade 1 Importance is proposed to be deleted in conjunction with the removal of the Green Belt designation at (2) previously. This is the former site of the Perry Oaks Sludge Works. With the construction and operation of Heathrow Terminal 5 it now forms part of the building and operational area of the airport.

6.2 LONDON BOROUGH OF HILLINGDON (2014): LOCAL PLAN PART 2: POLICIES MAP ATLAS OF CHANGES (PROPOSED SUBMISSION VERSION, SEPTEMBER 2014)

The following map is reproduced from Section 8: Proposed Extensions to Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance: Map 8.10: Medipark Site: Harefield.

ATLAS OF PROPOSED CHANGES TO UDP PROPOSALS MAP
PROPOSED SUBMISSION VERSION 2014

Map 8.10



7.0 APPENDIX B: SUMMARY OF SINC SELECTION PROCESS

7.1 ADVICE NOTE: PROCESS FOR SELECTING AND CONFIRMING SITES OF IMPORTANCE FOR NATURE CONSERVATION (SINCS) IN GREATER LONDON (MARCH 2013)

The methodology for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London is summarised below (taken from Advice Note: Process for selecting and confirming Sites of Importance for Nature Conservation (SINCs) in Greater London (March 2013)):

Set out below is a process, developed by the London Wildlife Sites Board, by which London Boroughs (including the City of London) should select and approve Sites of Importance for Nature Conservation (SINCs). The system in operation in London identifies three grades of SINC: Sites of Metropolitan Importance (SMI); Sites of Borough Importance (SBI); and Sites of Local Importance (SLI).

A. Roles and responsibilities of London Boroughs

- 1. It is the responsibility of London Boroughs to obtain and maintain **up to date data** on all land of nature conservation interest that is located within the administrative borough boundary, irrespective of land ownership. The borough also needs to be aware of the **distribution of priority habitats and priority species of wildlife, especially those species that are legally protected**. It should be noted that Borough-wide surveys of wildlife habitat were previously undertaken by the London Ecology Unit and latterly the Greater London Authority. This service is no longer provided at the regional level and **Boroughs are expected to undertake appropriate surveys**. Albeit the GLA and other regional bodies may undertake surveys of regionally important biodiversity and geodiversity resources from time to time.*
- 2. The Borough must have access to a current evidence base relating to habitats, species, etc. from which to support site selection, de-selection or changes to boundaries n.b. Greenspace Information for Greater London (GIGL) is the primary data holder in London. Boroughs are strongly recommended to enter into data exchange agreements with GIGL.*
- 3. The Borough should secure the services of qualified ecologists³ to survey⁴ relevant land within the borough boundary, evaluate this land against the criteria [for site selection set out below] and provide a set of recommendations on which sites should be accorded SINC status (and at which grade).*

³ This can be through paid ecological consultants, preferably members of the Institute of Ecology and Environmental Management (IEEM), or natural history experts willing to survey sites in a voluntary capacity, or on the basis of up-to-date information provided by surveys undertaken for other reasons e.g. a development proposal

⁴ Ideally this should be undertaken every 5-10 years, but it is recognised that some habitats and sites are not likely to undergo rapid change in terms of habitat and species composition and/or some parts of the borough may be undergoing more rapid change through regeneration programmes, therefore location or habitat specific surveys at different time intervals may be appropriate.

4. *The Borough should submit the survey data and recommendations to a local Site Selection Panel whose responsibility it is to provide independent, expert advice on the approach to surveys and evaluation and to validate any recommendations on SINC status. The Site Selection Panel should consist of a mix of local natural history experts and representatives of "Friends of..." groups and other local groups with an interest in land management; representatives of statutory agencies such as Natural England and/or Environment Agency and relevant NGOs such as London Wildlife Trust; and, other relevant Borough officers from planning and parks/greenspace teams.*
5. *On the basis of survey data and other relevant evidence and the advice provided by the local Site Selection Panel, the relevant Borough Officer should produce a schedule of proposed SINC's or changes to SINC's.*
6. *If an external validation of the process undertaken is required the Borough Officer should supply the schedule and supporting information to the LWSB for consideration at an LWSB meeting.*
7. *Following steps 1-5 above (or steps 1-6 if validation by the LWSB is required), the Borough Officer will use appropriate internal Borough processes, primarily those linked to the development of its Local Development Framework (LDF), to approve the Borough's SINC's. It is recommended that GIGL is notified of any changes or additions to the status or boundaries of SINC to ensure the maintenance of a comprehensive London-wide dataset.*

Further guidance is provided on survey information as set out below.

Survey Information

In order to choose sites for protection it is necessary to have good survey information on the habitats and species of all candidate areas.

The London Open Spaces Survey

Information on wildlife habitats can be collected in a standardised, comprehensive survey. We are fortunate in London in having such a survey, first carried out by the London Wildlife Trust for the Greater London Council in 1984/85, and updated and extended in various surveys since, including re-examination of sites to be described in the handbook series or in relation to proposed developments or management. In a number of London boroughs a systematic survey has been carried out using the former London Ecology Unit's specification since 1985. The specification was updated in 2000, when the GLA was established, to collect additional data required for open space planning. The format of the survey is similar to those usually described as 'Phase I' or 'Field by Field', but is enhanced by the extensive use of standardised written notes. Greenspace Information for Greater London (GIGL) now holds this survey information.

The initial survey documented areas with semi-natural habitats (more natural than well-gardened allotments or heavily mown urban playing fields) and was also confined to large areas (above 0.5 ha for inner boroughs and 1 ha for outer boroughs). Much subsequent survey work has documented open spaces regardless of their natural quality and has used a much lower area threshold, to provide a more comprehensive coverage.

Surveys helps to ensure that candidate sites are not overlooked and that the same essential minimum of information is available for each. There is usually little other information available on the quality of the wildlife habitats, but any information provided is taken into account.

Information on species

Information on species, which has been obtained in a consistent and standardised manner as part of the systematic survey of habitats should also be used in reaching decisions on site quality. Other information on species, relating to individual sites, is frequently available but has, until recently, rarely been collected in a systematic way so as to allow straightforward comparisons with other sites. GIGL holds extensive species data.

Information on species is often available from local naturalists, who are able to observe sites throughout seasons and years to provide an accurate and quite comprehensive listing of these and who may publish accounts of particular species or sites. Valuable though this information is, it often proves difficult to use it to compare candidate sites, as the recording effort put into each site may differ greatly and so may the completeness of the list. The length of the species list and the detection of rare species therefore depends upon the searching effort. For these reasons, such information on species is used only together with knowledge of how the information was obtained and of the way in which the ecology of individual species affects their apparent status.

Criteria for Choosing Sites

Having assembled all the useful survey information it is necessary to use a set of criteria for comparing one area with another. Appropriate criteria for assessing sites in an urban context are set out below. These are based upon many years' experience of comparing sites one with another in London, but they are not unique. While the terminology may differ in detail, many of these criteria closely correspond with those used by the Nature Conservancy Council and its successor bodies. The criteria are applied in the context of national and regional planning policy guidance on nature conservation, and taking account of the considerable experience of habitats and species throughout Greater London and their importance for nature conservation.

Kinds of criteria

Some of the criteria are based in ecological science, in that they are known to be related to attributes that are desirable (these include ancient habitats, size and non-recreatable habitats). Some criteria are based on intrinsic attributes (those that are properties of a site regardless of its geographic setting), but others take geography and use into account.

Taking the criteria together

There have been a variety of schemes published which attempt to put numerical scores onto criteria and to sum them to an overall score of importance. We agree with the vast majority of workers in this field that this practice is unrefined and does not lead to satisfactory results. Rather, the criteria are used to act as a guide for a professional judgement of a particular site in comparison with alternatives. For some sites only one or a few of the criteria may be important, but for others it may be all or most of them. Whichever criteria are important for a particular site, only those sites that provide a significant contribution to the ecology of an area are identified.

The criteria take relative, not absolute, values

It must be stressed that each criterion is used to facilitate a comparison of candidate sites within a given search area (metropolis, borough or locality within a borough) and thus they do not take absolute values independent of the search area. Obviously, criteria that show a site to be valuable for a larger search area than London (a region or nation, for example) mean that it is important to London. The converse is not necessarily so.

Representation

The best examples of each major habitat type are selected. These include typical urban habitats such as abandoned land colonised by nature ('brownfield'). Where a habitat is not extensive in the search area it will be appropriate to conserve all or most of it, whereas where it is more extensive a smaller percentage will be conserved.

Habitat rarity

The presence of a rare habitat makes a site important, because the loss of, or damage to, only a few sites threatens the survival of the habitat in the search area.

Species rarity

The presence of a rare species makes a site important in a way that parallels rare habitat.

Habitat richness

Protecting a site with a rich selection of habitat types not only conserves those habitats, but also the wide range of organisms that live within them and the species that require more than one habitat type for their survival. Rich sites also afford more opportunities for enjoyment and educational use.

Species richness

Generally, sites that are rich in species are to be preferred, as this permits the conservation of a correspondingly large number of species. However, some habitats, such as reed beds, heaths and acid woodlands, are intrinsically relatively poor in species.

Size

Large sites are usually more important than small sites. They may allow for species with special area requirements. Large sites may be less vulnerable to small-scale disturbance, as recovery is sometimes possible from the undisturbed remainder. They are also more able to withstand visitors, by diluting their pressure within a wider space. Size is also related to the richness of habitat and species, and so is used as a surrogate for these other two criteria where information is incomplete.

Important populations of species

Some sites are important because they hold a large proportion of the population of a species for the search area (eg waterfowl populations or colonial birds such as herons or jackdaws).

Ancient character

Some sites have valuable ecological characteristics derived from long periods of traditional management, or even a continuity in time to the woodlands and wetlands which occupied the London area before agriculture. Ancient woodlands, old parkland trees and traditionally

managed grasslands tend to have typical species that are rare elsewhere. These habitats deserve protection also because of the ease with which they are damaged by changes in management, ploughing, fertiliser and herbicide treatment.

Recreatability

Habitats vary in the ease with which they can be recreated and the length of time required; for example ponds can be created from scratch with reasonable success within a few years, but woods not only take much longer - at least decades - to mature, but even then they do not contain the same flora and fauna as ancient woods on undisturbed soils. In addition to the ecological reasons why certain habitats cannot be recreated, many sites are not capable of being recreated because of practical reasons such as land availability and cost. The more difficult it is to recreate a site's habitats the more important it is to retain it.

Typical urban character

Features such as canals, abandoned wharves, walls, bridges, tombstones and railway sidings colonised by nature often have a juxtaposition of artificial and wild features. Some of these habitats are particularly rich in species and have rare species and communities of species. Their substrates may have a particular physical and chemical nature which allows species to thrive that are rare elsewhere. They may also have particular visual qualities. Such areas are often useful for the study of colonisation and ecological succession.

Cultural or historic character

Sites such as historic gardens with semi-wild areas, garden suburbs, churchyards and Victorian cemeteries which have reverted to the wild may have a unique blend of cultural and natural history.

Geographic position

This criterion is operated through the use of search areas and areas of deficiency (see A1.2.1, A1.2.13 and A1.4.4 above).

Access

Access is an important consideration, especially in areas where there may be few places for large urban populations to experience the natural world. Nature conservation is not restricted to the preservation of wildlife, but goes hand in hand with the enjoyment of it by all people, from the specialist naturalist to the casual visitor. Some access is desirable to all but the most sensitive of sites, but direct physical access to all parts of a site may not be desirable.

Use

The importance of a site can include its established usage (eg for education, research, or quiet enjoyment of nature).

Potential

Where a site can be enhanced given modest changes in management practices this gives it value. Opportunity exists where a site is likely to become available for nature conservation use, or where there is considerable local enthusiasm about it, or where a voluntary group is willing to use and manage it. Potential in this context can be for habitat enhancement through

management, for educational or nature conservation amenity use. Where such potential could remedy a deficiency, or is readily capitalised, it is considered important.

Aesthetic appeal

This factor is the most difficult to measure, but it includes such factors, which contribute to the enjoyment of the experience of visiting a site, as seclusion, views, variety of landscape and habitat structure, colour, and natural sounds and scents.

Geodiversity interest

Where a site has a geological interest which has educational, scientific, historical or aesthetic interest as set out in London's Foundations (2009)

8.0 APPENDIX B: SINC CITATION AND RAW SURVEY DATA

8.1 SINC CITATION

Site of Importance for Nature Conservation

Hi BI 15: Medipark Site, Harefield

Grid ref: TQ050 912

Area (ha): 8.04

Borough: Hillingdon

Site first notified: 08/07/2002 **Boundary last changed:** 8/7/02

Citation last edited: 23/2/05

Habitat: Neutral and calcareous grassland, secondary woodland, ruderal, roughland, bare artificial, native broadleaved woodland.

An interesting mosaic of habitats has developed within the former grounds of a demolished hospital building, including species-rich neutral to calcareous grassland, scrub and some marginal secondary woodland. The best of the grassland supports a sizeable population of bee orchid (*Ophrys apifera*), as well as occasional pyramidal orchid (*Anacamptis pyramidalis*), common broomrape (*Orobanche minor*), glaucous sedge (*Carex flacca*), grass vetchling (*Lathyrus nissolia*) and dwarf gorse (*Ulex minor*), all regionally restricted plants of local distribution within the borough. The secondary woodland consists mainly of oak (*Quercus robur*) with some beech (*Fagus sylvatica*) and common hawthorn (*Crataegus monogyna*), and a ground flora of bramble (*Rubus fruticosus*) and bluebell (*Hyacinthides non-scripta*). The invertebrate fauna is likely to be of interest and includes both marbled white and common blue butterflies, as well as the nationally scarce Roesel's bush-cricket (*Metriopectera roeselii*).

There is no public access.

This site has been identified since the adoption of the Supplementary Planning Guidance in 1994.

8.2 RAW SURVEY DATA

Not available.

JOB NAME:
CLIENT:
REPORT TITLE:
STATUS:

PREPARED BY:	<small>PRINT NAME</small> J. Fewtrell	<small>POSITION</small> Senior Ecologist	<small>SIGNATURE</small>
	<small>PRINT NAME</small> O. Prudden	<small>POSITION</small> Director	<small>SIGNATURE</small>
CHECKED BY:	<small>PRINT NAME</small> O. Prudden	<small>POSITION</small> Director	<small>SIGNATURE</small>
	<small>PRINT NAME</small> O. Prudden	<small>POSITION</small> Director	<small>SIGNATURE</small>
APPROVED BY:	<small>PRINT NAME</small> O. Prudden	<small>POSITION</small> Director	<small>SIGNATURE</small>
	<small>PRINT NAME</small> O. Prudden	<small>POSITION</small> Director	<small>SIGNATURE</small>

REVISIONS:

Rev No.	Comments	Date
2.0	Final for issue	31/10/2014

Disclaimer:

This report was prepared by Biodiversity by Design Ltd at the instruction of, and for sole use by, our client. It does not in any way constitute advice to any third party who is able to access it by any means. Biodiversity by Design Ltd excludes to the fullest extent lawfully permitted all liability for any loss or damage howsoever arising from reliance on the contents of this report. We do not however exclude our liability (if any) for personal injury or death resulting from our negligence, for fraud or any other matter in relation to which we cannot legally exclude liability.



ENGLISH HERITAGE

Local Development Framework Team
London Borough of Hillingdon

BY E-Mail:

ldfconsultation@hillingsdon.gov.uk

4 November 2014

Dear Sir/Madam

London Borough of Hillingdon: Part 2 – Hillingdon Local Plan: Development Management Policies; Site Allocations; and Sustainability Appraisal

Thank you for consulting English Heritage on the second part of the London Borough of Hillingdon's Local Plan development covering Development Management Policies and Site Allocations; and the related Sustainability Appraisal. As the Government's statutory adviser on the historic environment, English Heritage is keen to ensure that heritage conservation and enhancement is fully considered in all aspects of the local planning process.

Accordingly, we have reviewed your consultation in light of the *National Planning Policy Framework* (NPPF) which requires, as one of its core principles, that heritage assets be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

Sustainability Appraisal

English Heritage recommends simplifying the Sustainability Appraisal (SA) Objective relating to heritage as follows: To conserve and enhance heritage assets and their settings. Subject to our further consideration of the Borough's proposed Site Allocations see below, this will ensure that impacts on all types of heritage asset are covered and that all elements of a heritage asset's significance are included. In relation to the Development Management Policies, we do not consider that this would alter the findings of the SA in relation to heritage.

English Heritage notes that the condition of Conservation Areas may prove a useful indicator in relation to improving the aesthetics of the borough in Appendix 2. Similarly, reducing the number of Conservation Areas on our Heritage at Risk Register for positive reasons could be a good target for this matter.

Local Plan Part 2 – Development Management Policies

English Heritage notes that policies DMHB1A(iv), DMHB5 and DMHB6 use the word 'preserve' where we would advise use of the word 'conserve'. The reason for this, as explained in our e-mail of 23 May 2014, is that the 'conservation' of heritage assets in a manner appropriate to their significance is a core planning principle (para 17, NPPF). National policy takes forward the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 in a positive and proactive way; 'conservation' is defined in the glossary of the NPPF as 'the process of maintaining and managing change to a heritage

asset in a way that sustains and, where appropriate, enhances its significance'. The recently published National Planning Practice Guide expands on this at ID 18a-003-20140306. English Heritage therefore considers that 'conserve' is more appropriate to a Local Plan policy than 'preserve' – the latter requires that an asset is kept from harm, and thus may be understood as a more passive term.

English Heritage welcomes the reference to the appropriate adaptation of heritage assets for improved environmental performance in Policy DMHB1B. We consider that this could be accompanied by justification paragraphs that refer to the 'whole house' approach that we take to such adaptation. This could reference a range of our advice documents that can be found on our web site as follows: <http://www.english-heritage.org.uk/your-home/saving-energy/>

English Heritage greatly appreciates the Borough's robust approach to the conservation and enhancement of its historic environment, but must advise that the phrase "when every option for a viable future use has been exhausted" in Policy DMHB4B runs the risk of being considered non-compliant in terms of the NPPF. The reason for this opinion is that it does not appear to leave room for the public benefit justification provided for by the NPPF. Consequently, we suggest that this policy be amended by adding the following phrase at the end of the policy: "or the proposal is sufficiently justified on the grounds of public benefit".

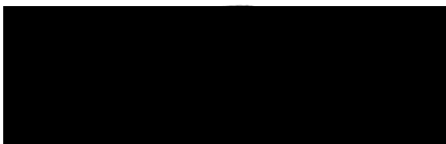
Local Plan Part 2 - Site Allocations

English Heritage is concerned that the Borough's site allocations do not yet sufficiently reflect their implications for the historic environment. For example, Packet Boat Lane; Royal Quay, Summerhouse Lane; and Trout Road, Yiewsley are all in Archaeological Priority Areas but this is not mentioned in their site allocations. Unfortunately, we have not been able to undertake a complete review of all of the site allocations in order to provide the Borough with a comprehensive set of recommendations for the sites. We will complete this review by the end of this week and forward it as a supplement to this response by 17.00pm on Friday 7 November.

English Heritage will include with this supplementary advice any additional comment on the sustainability appraisal for the site allocations.

As ever we must note, for the avoidance of doubt, that this advice is based on the information provided by you and does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise relating to this or later versions of the documents that comprise the second part of the Local Plan, and which may have adverse effects on the historic environment.

Yours sincerely



Claire Craig

Principal Adviser – Historic Places Team: London





ENGLISH HERITAGE

Local Development Framework Team
London Borough of Hillingdon

BY E-Mail:

ldfconsultation@hillingdon.gov.uk

7 November 2014

Dear Sir/Madam

London Borough of Hillingdon: Part 2 – Hillingdon Local Plan: Site Allocations and Sustainability Appraisal

Thank you for consulting English Heritage on the second part of the London Borough of Hillingdon's Local Plan development covering Development Management Policies and Site Allocations; and the related Sustainability Appraisal. As the Government's statutory adviser on the historic environment, English Heritage is keen to ensure that heritage conservation and enhancement is fully considered in all aspects of the local planning process.

Further to our response of 4 November, English Heritage has now reviewed all of the site allocations against the Greater London Historic Environment Record. As a result of this review, we have also reconsidered the Sustainability Appraisal (SA) findings for those sites for which heritage implications have been overlooked. The list below identifies the potential heritage implications that have been overlooked for the specific site and makes a recommendation in relation to the SA findings for that site as well.

- **Packet Boat House, Packet Boat Lane, Cowley** – This site is within an Archaeological Priority Area (APA).

The SA rating for this site is currently neutral for heritage but without acknowledging the potential for impacts on the APA. English Heritage recommends that the rating is checked in light of the potential we have identified.

- **Initial House, Field End Road, Eastcote** – This site is in the setting of a conservation area.

The SA rating for this site is currently neutral even though it acknowledges the conservation area when the site allocation itself does not. As planning permission has been granted, English Heritage considers that it would be useful to explicitly state that the impact of the development is neutral on the conservation area.

- **Land to the South of the Railway, including Nestle Site, Nestle Avenue, Hayes** – While this site does mention that it is within a conservation area, we recommend that this is refined to identify that Site A is within the conservation area and Site B is in the setting of the conservation area. In addition both sites are within the setting of several listed buildings.

The SA does acknowledge these designations and we consider that the rating that the impact on heritage is dependent on implementation is accurate. However, given this, it would seem even more important to alert developers to the potential for impacts on heritage by including the above information in the site allocation itself.

- **Western Core, Hayes** – In the setting of a Grade II listed building.

The SA does not specifically reference the setting of the listed building however, it does note that the impact on heritage is dependent on implementation. As for the land south of the Railway (above), this would seem to make it even more important that the heritage implications are included within the site allocation.

- **Royal Quay, Summerhouse Lane, Harefield** – This site is within a conservation area and an APA. It is also within the setting of two listed buildings to the south.

The SA indicates that impacts on heritage are dependent on implementation and this stems from identifying the conservation area status only. English Heritage considers that this makes it very important to acknowledge all of the heritage implications within the site allocation.

- **Chailey Industrial Estate, Pump Lane, Hayes** – in the setting of Grade II listed building.

The SA finds that this site allocation is positive for heritage but does not acknowledge the potential for impacts on the listed building. English Heritage recommends that the rating is checked in light of this or a more explicit statement about the setting of the listed building incorporated in this part of the SA.

- **Silverdale Road/Western View, Hayes** – in the setting of a Grade II listed building.

The SA finds that this site allocation is positive in relation to heritage but does not acknowledge the potential for impacts on the listed building. English Heritage recommends that the rating is checked in light of this or a more explicit statement about the setting of the listed building included in this part of the SA.

- **148-154 High Street / 25-30 Bakers Row (WH Smith), Uxbridge** – This site does state that it is in an APA, however it is also located in the setting of two conservation areas and a number of listed buildings.

The SA does not identify the potential heritage impacts and rates the site allocation as neutral. English Heritage recommends that that rating is checked in light of the extensive heritage designations relating to the site and a more explicit statement about the setting of these impacts included in the SA.

- **St Andrews Park** – This site is within the setting a number of listed buildings. In addition there are three listed buildings within the site itself that are also not referenced.

The SA rates this site as very positive for heritage impacts but does not explain why. English Heritage recommends more explicit reference be made in the SA as to why the outcome is so positive. Presumably, for example, it involves the adaptive reuse of the listed buildings on the site.

- **Cape Boards Site, Iver Lane, Cowley** – This site is in an APA and within the setting of a conservation area.

This site gets a very positive rating in the SA without explaining why and this time without acknowledging the heritage impacts. English Heritage would welcome an explicit reference as to why it works so well for heritage here.

- **Padcroft Works, Tavistock Road, Yiewsley** – This site is in an APA and within the setting of a Grade II listed building.

This site gets a very positive rating in the SA without explaining why and again without acknowledging the potential heritage impacts. English Heritage would welcome an explicit reference as to why it works so well for heritage in this part of the SA please.

- **Trout Road, Yiewsley** – This site is in an APA.

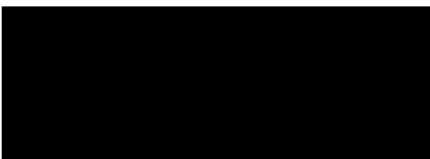
This site gets a very positive rating in the SA without explaining why and again without acknowledging the potential heritage impacts. English Heritage would welcome an explicit reference as to why it works so well for heritage in this part of the SA please.

- **Uxbridge Health Centre, Chippendale Waye** – this site is in the setting of an APA.

The SA rating for this site is currently neutral for heritage but without acknowledging the potential for impacts on the APA. English Heritage recommends that the rating is checked in light of the potential we have identified.

As ever we must note, for the avoidance of doubt, that this advice is based on the information provided by you and does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise relating to this or later versions of the documents that comprise the second part of the Local Plan, and which may have adverse effects on the historic environment.

Yours sincerely



Claire Craig

Principal Adviser – Historic Places Team: London





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	British Airways C/O Agent		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMAV1: Safe Operation of Airports
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA supports policy DMAV1 which promotes the continued safe operation of Heathrow Airport.

Specific support is given to ensuring that sensitive uses are not located in areas significantly affected by aircraft noise. All sensitive uses should be located in areas unaffected by the operation of Heathrow Airport.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	British Airways C/O Agent		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMAV2: Heathrow Airport
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The findings Airport Commission (AC) in relation to additional airport capacity in the UK is currently pending. These findings potentially will to have a significant impact on Heathrow Airport and its operation. Although noting the environmental concerns identified in draft Policy DMVA2 this policy will need to be reviewed once future plans for Heathrow Airport are confirmed through national airport policy. This should be explicitly recognised in this policy.

More specifically, the word “significant” should be added before “increase” in criteria (iii) as well as before “deterioration” in criteria (iv) and before “adverse” in criteria (v) to ensure that airport related development can still come forward where environmental effects are negligible or can be sensibly addressed through mitigation measures.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

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N/A

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2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	British Airways C/O Agent		
Unit		House number	
House name			
Address 1			
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County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
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Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMAV3: RAF Northolt
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Whilst the growth of civil flights at RAF Northolt is not a substantive concern in terms of competition with BA and Heathrow Airport the potential for increased activity to add to local road congestion is. Allowing flights to increase without proper consideration being given to the potential effects upon highway capacity and the need to improve public transport accessibility is a concern in relation to RAF Northolt.

BA is aware that the RAF has announced that its 7,000 commercial movements per year is to be increased to 12,000 over the next three years.

BA therefore supports Policy DMAV3 and the restrictions attached with reference to transport and noise impacts to ensure these are mitigated appropriately.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

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PART B - Your responses:

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Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
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<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME3: Office Development, Heathrow Perimeter (Para 2.22)
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA supports in general the approach set out in draft Policy DME3 in relation to the defined 'Heathrow Perimeter' area.

The pre-amble at para 2.22 to this draft policy confirms that "airport related uses" should be located within the airport boundary with "other activities", including hotels, offices and employment uses, should be directed to appropriate locations around the perimeter. This draft policy goes on to note that the most suitable locations for offices include Bath Road, BA Waterside, Harmondsworth and the South West Road.

As a consequence draft Policy DM3 (A) states that the Council will seek to accommodate the majority of planned office floorspace within Uxbridge town centre, Stockley Park and the Heathrow Perimeter.

Given the need for flexibility to encourage other airport related activities to locate around the Heathrow Perimeter we would question whether the constraint in effect imposed by para (C) of this policy, which discourages changes of use of existing office floorspace, is appropriate. As recognised by the pre-amble to this policy Heathrow attracts a range of uses including hotels and other employment uses and these are appropriately located in the Heathrow Perimeter area. The effect of para (C) would be to unduly constrain this need for flexibility and place a priority on the protection of office sites which is considered to be inappropriate in the Heathrow Perimeter area.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

We would suggest therefore that the policy makes clear that para (C) does not apply to the Heathrow Perimeter area for this reason.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
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First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME5: Hotels and Visitor Accommodation
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It is important to BA to have a wide range of choice of hotels in close proximity to Heathrow for its passengers, crew and other staff.

In this context BA welcomes the recognition in the preamble to draft Policy DME5 (para 2.30) that the hotel industry based around Heathrow Airport is a significant contributor to Hillingdon's economy.

Whilst noting that the Heathrow Perimeter area, specifically Bath Road, BA Waterside, Harmondsworth and along the South West Road, will continue to be a key location for offices consideration should also be given to accommodating hotel uses in accessible locations in close proximity to Heathrow Airport to contribute and enhance the economic offer of the Airport through the provision of facilities such as conference and meeting space and restaurants.

This objective should be reflected in Policy DME5.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

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b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME11: Sustainable Design Standards
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It is noted that draft Policy DME11 requires non-residential development to achieve a minimum of 'Very Good' under the relevant BREEAM assessment. Whilst recognising the positive intent of this policy there may be circumstances where due to a particular building design or other constraints that this BREEAM level cannot be achieved.

We would suggest therefore that additional wording should be added to this policy to state that this requirement need not be met where reasoned justification can be provided.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
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3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
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(please tick relevant box)

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<input checked="" type="checkbox"/>	Development Management Policies
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Technical Reports (answer Q1 & Q9 only)	
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<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME118: Air Quality
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA notes the requirement within the plan to put in place measures to reduce emissions and improve local air quality (para 6.54).

However there is a concern that draft Policy DME18 potentially places an embargo on all development within the surrounding location of Heathrow Airport to the clear detriment of the local economy and the operation of Heathrow Airport.

BA believes that it is unreasonable to require developments that are in areas already above the national and European regulated levels to demonstrate reductions in emissions to ensure air quality levels for existing receptors are met.

These matters may be out of the control of developer, making the policy un-implementable and unnecessarily stifling development.

Unless it is clear that this policy does not unduly restrict development it should be deleted.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

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Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input type="checkbox"/>	The adoption of the Local Plan Part 2

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1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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PART A - Your Details (must be completed)

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	British Airways C/O Agent		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMHB12: High Buildings and Structures
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA welcomes the requirement within Policy DMHB12 (xi) that high buildings and structures must “comply with Aviation and Navigation requirements and not interfere, to an unacceptable degree, with telecommunication, television and radio transmission networks”.

It is critical to consider the height of proposed buildings to protect aviation safety throughout the Borough.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	British Airways C/O Agent		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMT4: Public Transport
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA welcomes the Council's support and promotion of enhancement of public transport facilities at key interchanges, such as at the Heathrow Bus Interchange (identified in the Site Allocations Document as a Key Transport Interchange).

The need to improve north/south links in the Borough is also endorsed. There is a need to ensure that the employees and customers within Hillingdon, that work at or use Heathrow Airport, are able to travel using public transport.

At present, north/south links in the Borough are not as strong as the east-west public transport links. This is recognised in para 8.17 of the Plan and BA wishes to encourage this as an area for improvement.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	British Airways C/O Agent		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMT6: Vehicle Parking
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA supports the proposals to improve public transport accessibility; however it is likely that without investment in major infrastructure that a high proportion of journeys to Heathrow will continue to be undertaken by car.

Recognising the above and the continued need to make appropriate car parking provision as a consequence BA welcomes the provision in Policy DMT6 that although development must comply with the Borough parking standards the Council may agree to vary these requirements when:

1. the variance would not lead to a deleterious impact on street parking provision, congestion or local amenity and/or
2. a transport appraisal and travel plan has been approved and parking provision is in accordance with its recommendations.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Last Name			
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House name			
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2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Dennis
Last name	Pope
Company	Nathaniel Lichfield & Partners
Unit	
House name	
Address 1	
Address 2	
Town	
County	
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Telephone	
Email	

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Para 2.8-2.10 Heathrow Airport
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

BA supports the aim to maximise the economic benefits of Heathrow whilst mitigating negative environmental impacts.

It is evident that the Opportunity Area Framework will face a significant challenge in accommodating and identifying sites to meet the employment and housing targets identified for it. Our clients welcome the opportunity to contribute to the preparation of the suggested Opportunity Areas Planning Framework in due course. It will be important to ensure that the growth of employment and housing in this area will be carefully managed, avoiding those areas which are focused on meeting the needs of airport related activities.

Bath Road, Hayes

BA supports the assessment made in para 4.27 that this site is not suitable for housing development. However BA has concerns over the allocation of the site as a Locally Significant Employment Site as this may restrict flexibility of these sites being developed for non-employment airport related use such as hotels.

Covert Farm, Heathrow

BA supports the assessment made in para 4.30 that this site is not suitable for housing development. BA has concerns over allocation of the site as a Locally Significant Industrial Location as this may restrict the flexibility of these sites being developed for non-employment airport related use such as hotels.

2) Former Perry Oaks Sludge Works Site, Heathrow

BA supports the removal of this site from the Green Belt given that it now forms part of Heathrow Airport and no longer performs a function as Green Belt. In conjunction BA supports the removal of this land as a site of Nature Conservation site of Metropolitan or Grade 1 Importance for the same reason.

6) Key Transport Interchanges

There is a need, in particular, to ensure that the employees and customers within the Borough of Hillingdon that work at or use Heathrow Airport are able to travel using public transport. At present, north/south links in the Borough are not as strong as the east-west public transport links.

The Local Plan Part 1 states in Policy T2 that the Council will facilitate improved public transport interchanges in five key locations, one of which being Heathrow Airport. BA supports the safeguarding of the Heathrow Bus Interchange Land which should be developed further as an improved public transport interchange.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

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2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
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1. Name and Address	
Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME15 Development in Green Chains
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME15 should be more strongly worded.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Preferred wording: 'will be resisted unless' instead of 'will only be supported if'

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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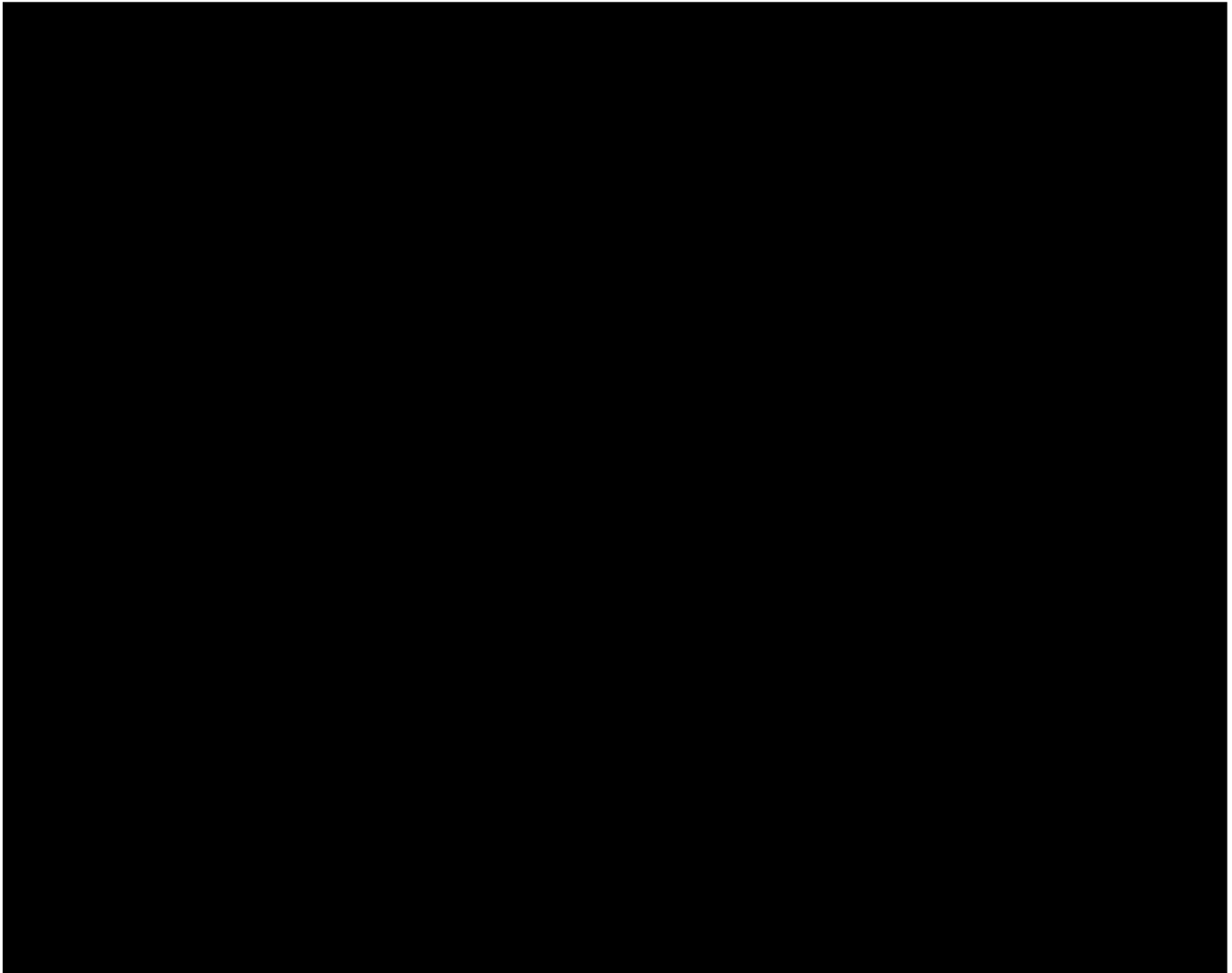
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PART A - Your Details (must be completed)

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1. Name and Address	
Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME17 Biodiversity Protection and Enhancement
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME17 is welcomed and supported.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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PART C - Information on the progress of the Local Plan Part 2

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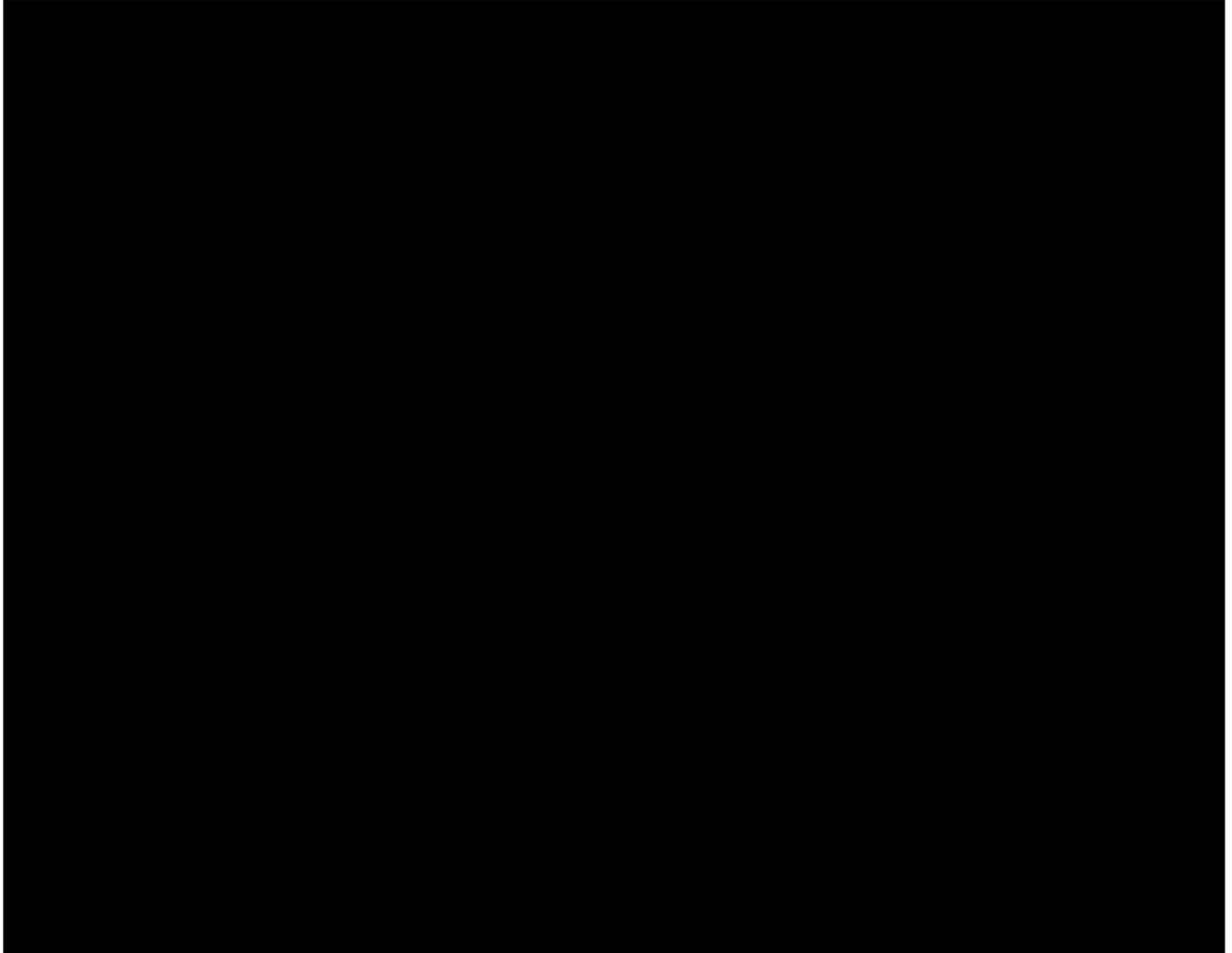
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First name	Roger
Last Name	Taylor
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2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
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Address 2		
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Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Policy DME18 Waterside Development
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Policy is supported in general but should make additional reference to biodiversity improvements in relation to rivers as well as canals.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

In the 5th line of the Policy, after 'waterside environment' add 'and biodiversity'.
[Note that there is a surplus 'improvements' in the last two lines of the Policy.]

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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PART C - Information on the progress of the Local Plan Part 2

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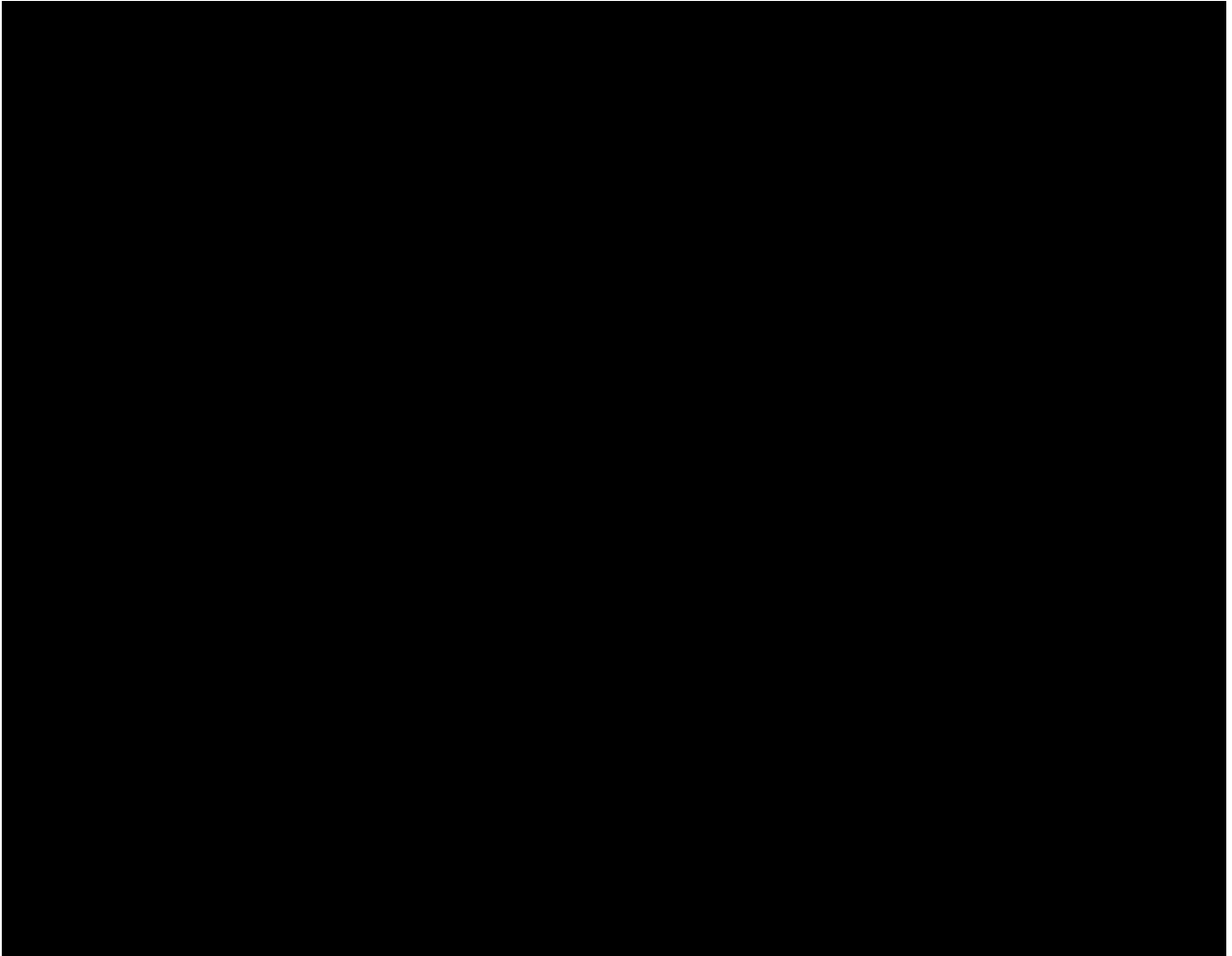
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Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
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Email		

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Policies Map: composite map for Heathrow East

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The boundary of the Crane Meadows Nature Reserve is omitted. This London Wildlife Trust Nature Reserve part of which was formally known as Huckerby's Meadow) lies between the River Crane and the airport perimeter. Its designation and improvement is an important enhancement to the Green Belt and river corridor.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The boundary should be added. We can provide details if it is not readily available from Greenspaces Department.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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PART C - Information on the progress of the Local Plan Part 2

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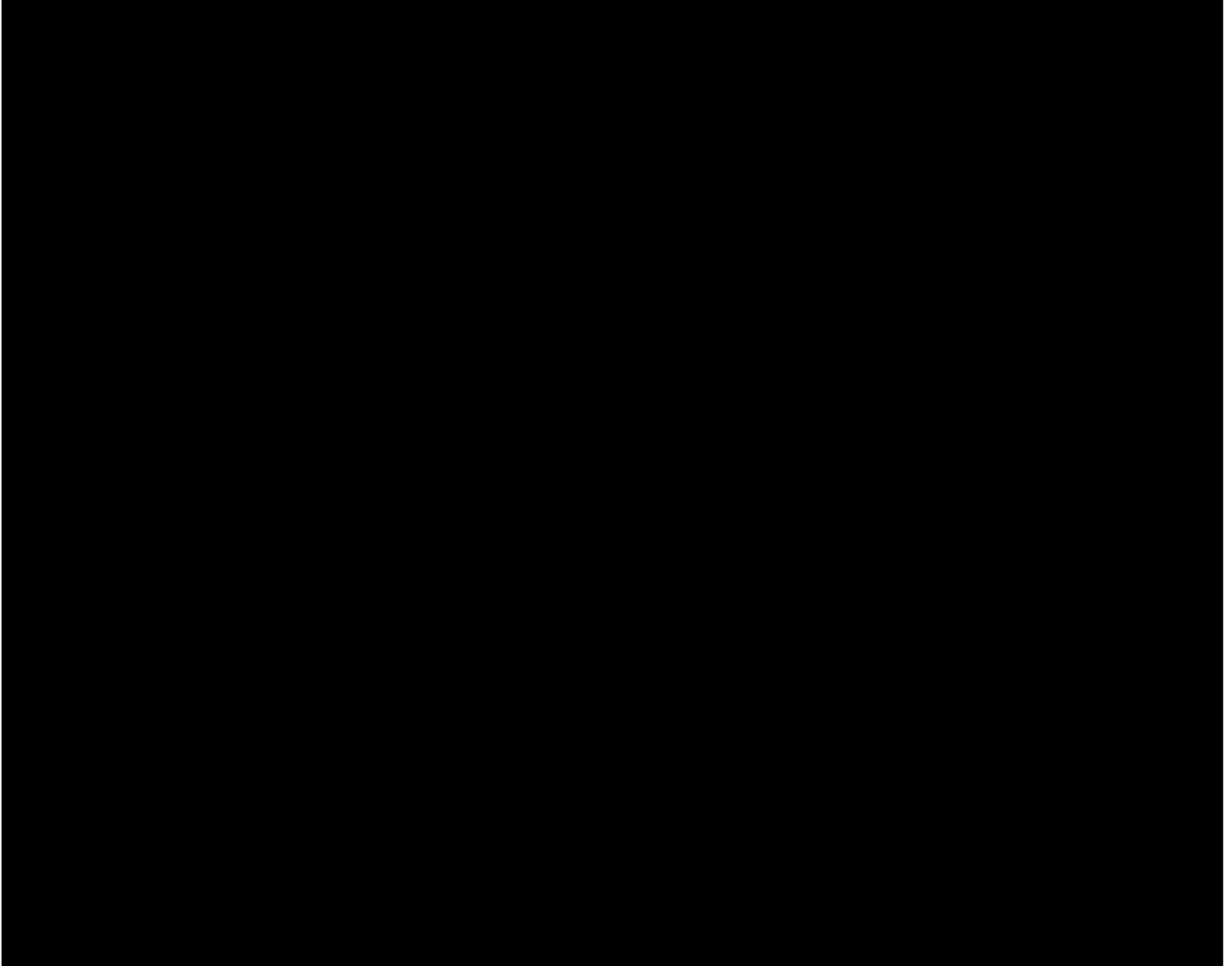
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Policies Map: composite map for Ickenham

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The boundary of the Frays Farm Meadows Nature Reserve is omitted. The boundary of the wider Frays Valley Local Nature Reserve is also omitted. (The latter covers more than just the individual nature reserves managed by London Wildlife Trust and Hillingdon Natural History Society.)

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The boundaries should be added. We can provide details if they are not readily available from Greenspaces Department.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

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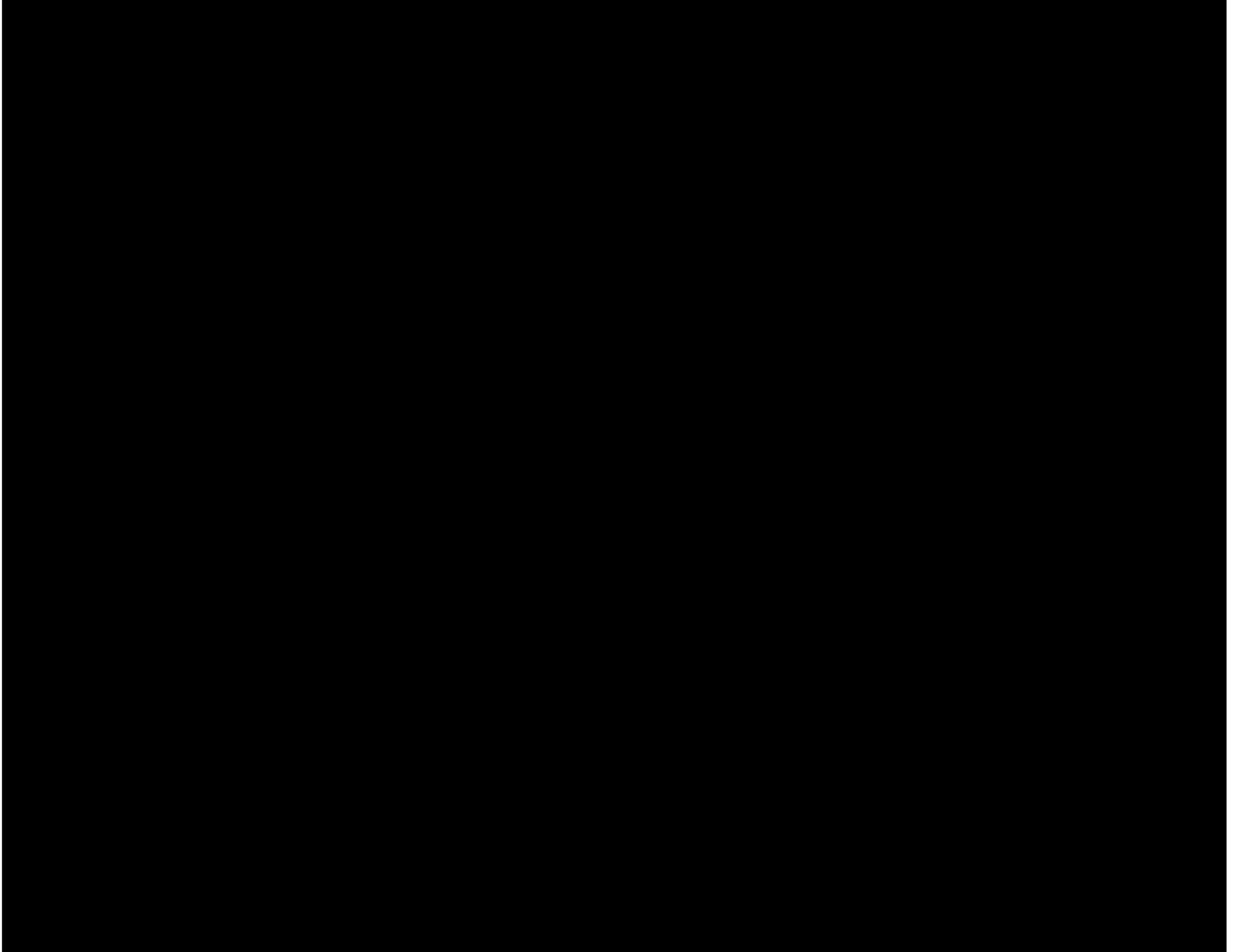
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PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
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<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Policies Map: composite map for West Drayton

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Nature Reserve boundary shown for Frays Island / Mabey's Meadow Nature Reserve on Thorney Mill Road is inaccurate in that it omits the meadow element.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The boundary should be extended. We can provide details if it is not readily available from Greenspaces Department.

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<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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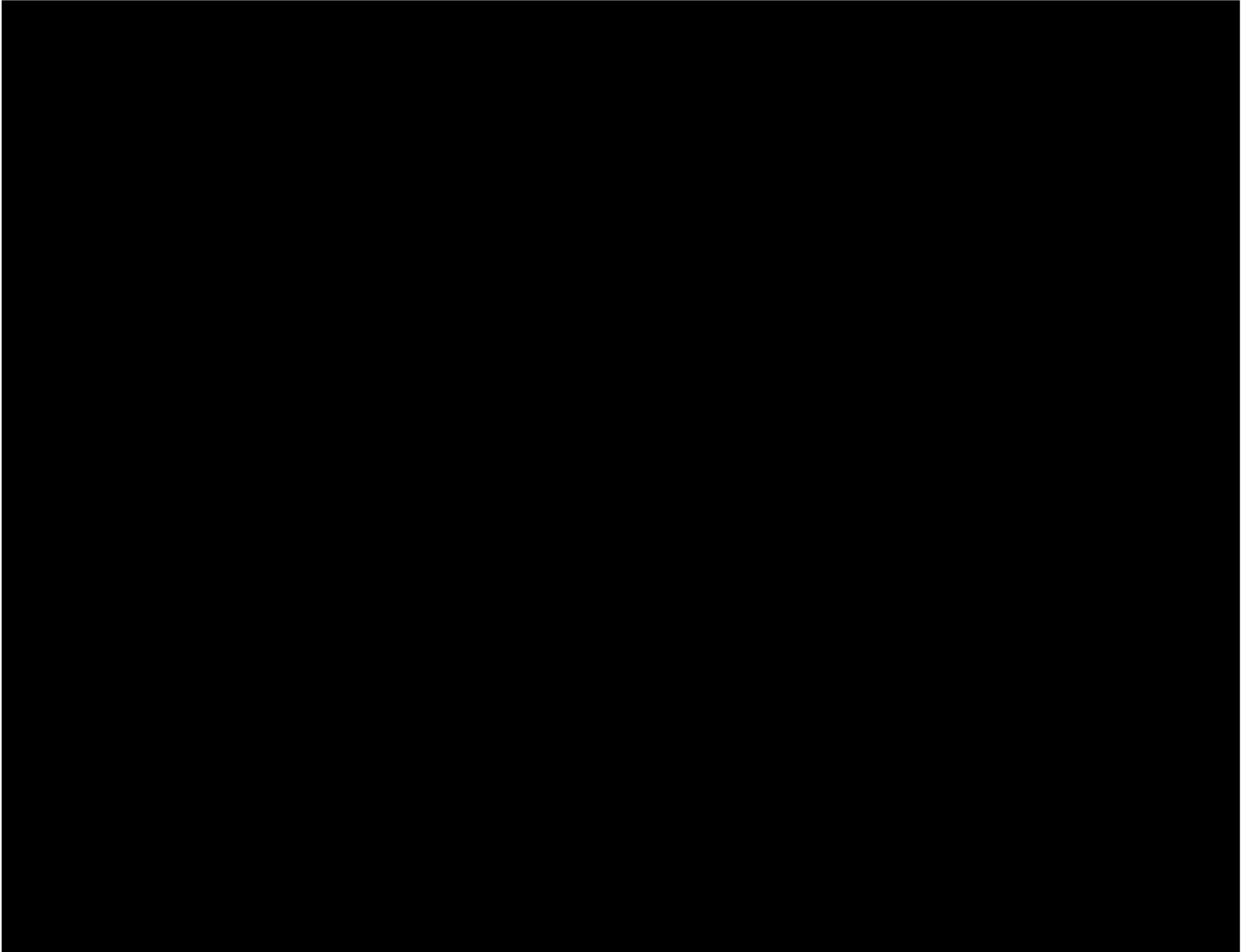
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Monitoring Questions

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HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	para 5.10
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Green Belt, Metropolitan Open Land and Green Chain additions are welcomed and supported.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME16 Development in Green Edge Locations
Paragraph Number; or	paragraph 6.20
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The explanatory text should be more specific as to locations covered.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The list of locations should also specifically include Green Chains, Sites of Importance for Nature Conservation, and Nature Reserves.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

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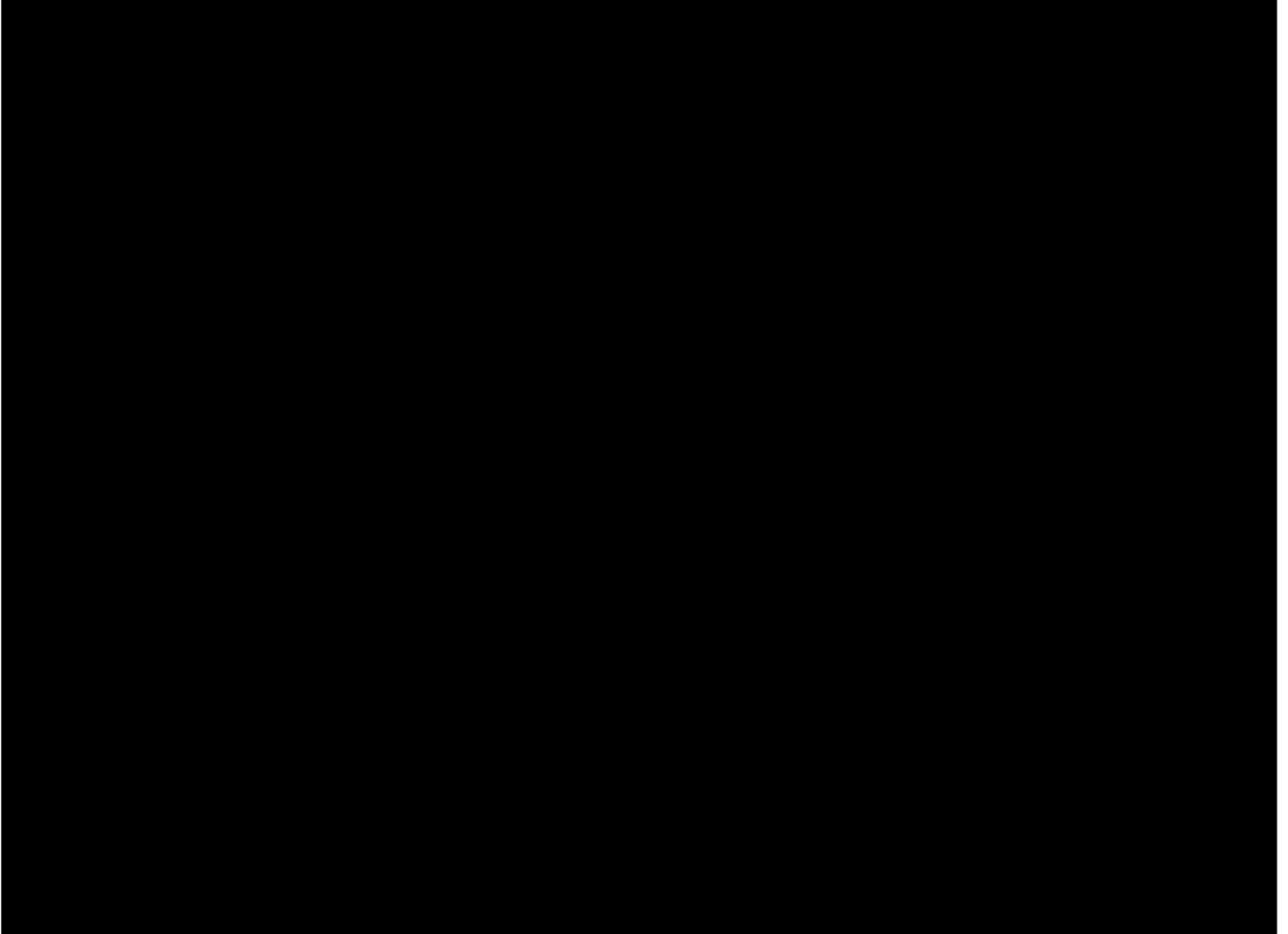
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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME16 Development in Green Edge Locations
Paragraph Number; or	paragraph 6.21
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The explanatory text should specifically refer to biodiversity enhancements.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The landscaping requirement should also make reference to biodiversity enhancements.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Empty box for comments.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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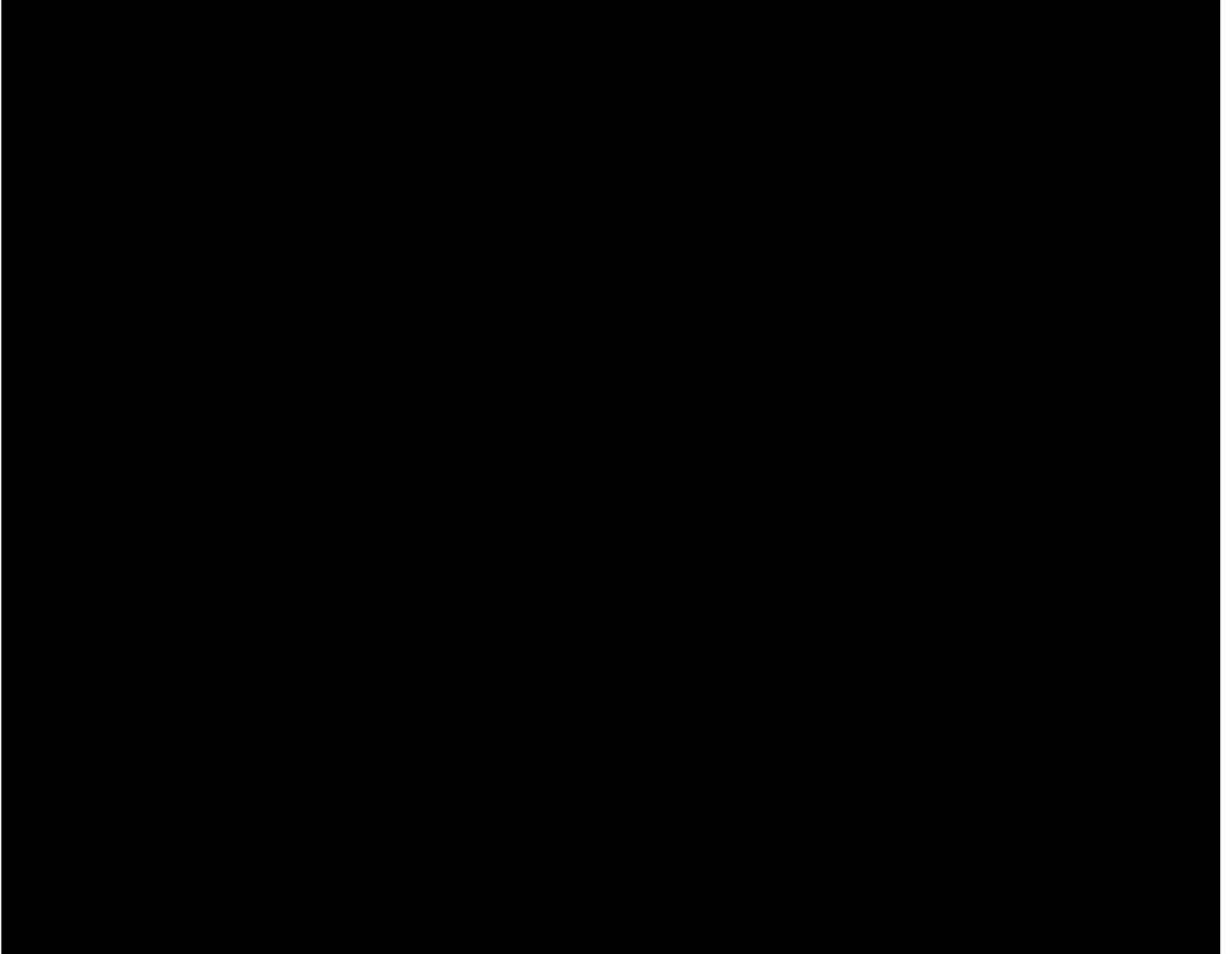
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PART A - Your Details (must be completed)

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1. Name and Address	
Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 6.1 Extensions to Sites of Importance for Nature Conservation
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We welcome and support the proposed extensions.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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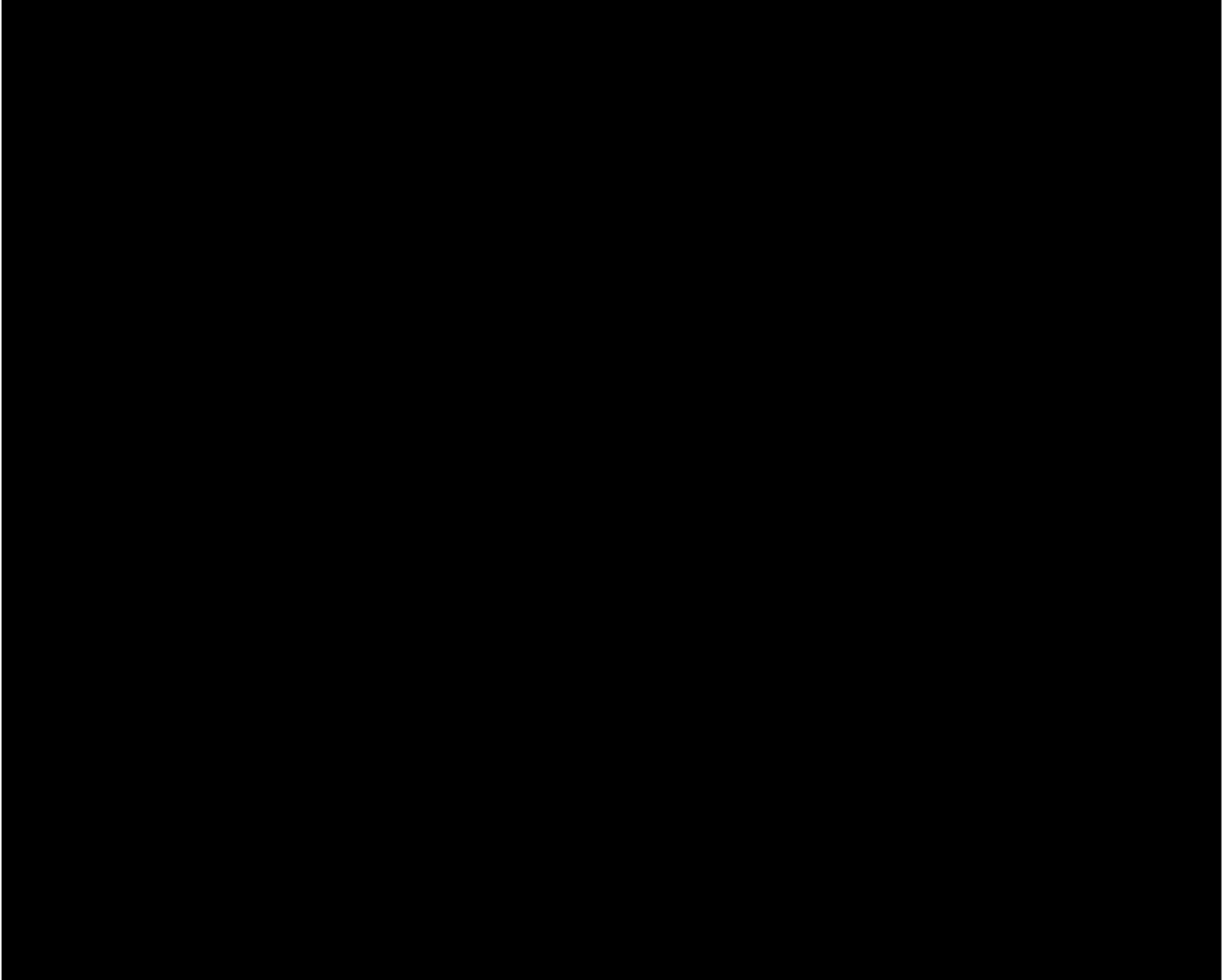
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Title	Mr
First name	Roger
Last Name	Taylor
Organisation (if relevant)	London Wildlife Trust (Hillingdon Group)
Unit	
House name	
Address 1	
Address 2	
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County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
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Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 6.2 New Sites of Importance for Nature Conservation
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We welcome and support the proposed additions.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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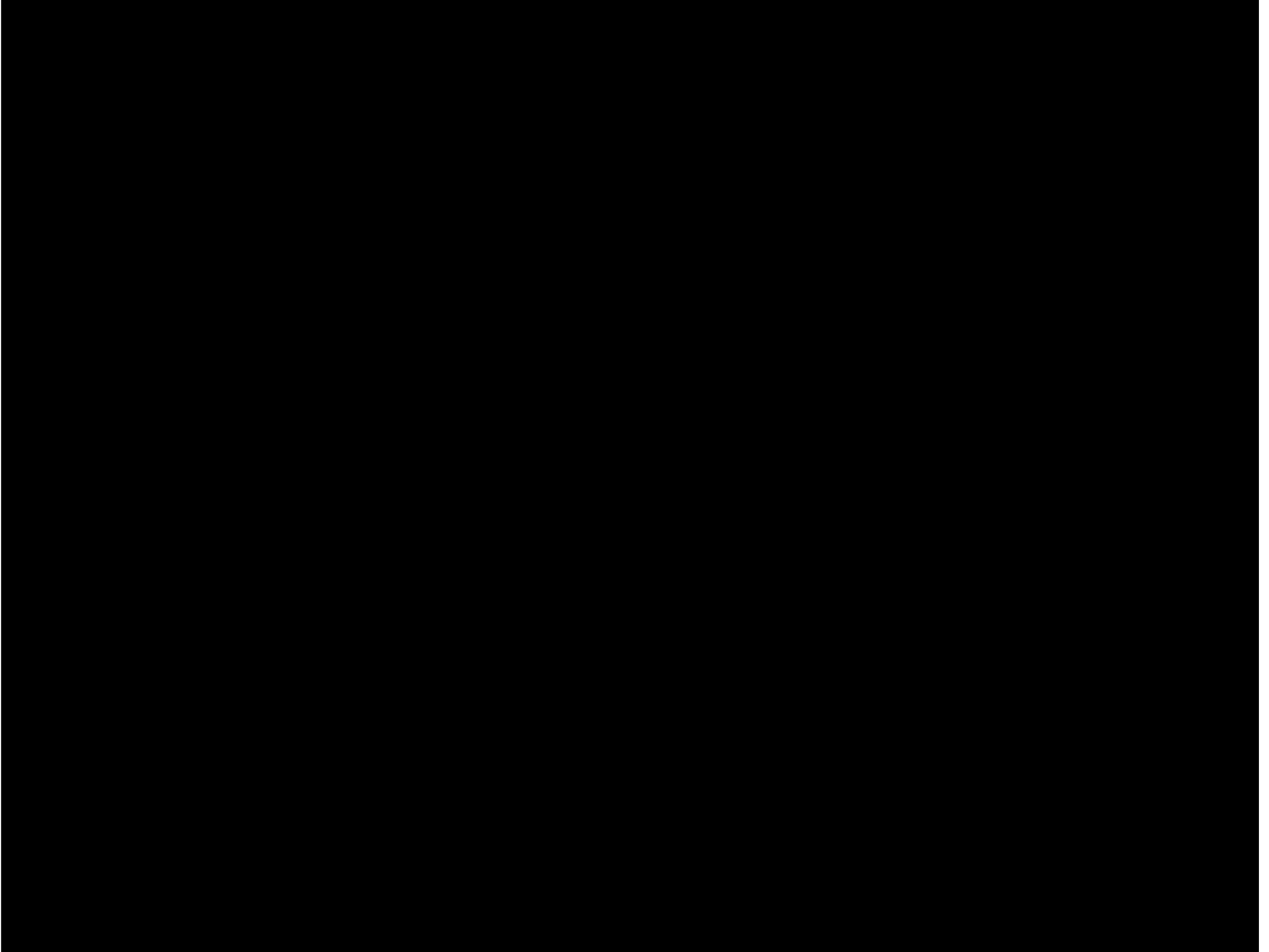
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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Deutsche Alternative Asset Management (UK) Limited		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Colin		
Last name	Burnett		
Company	Burnett Planning & Development Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC 1: Town Centre Developments
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Policy is not consistent with the NPPF retail and sequential tests (NPPF paragraphs 24 – 27) and therefore is also inconsistent with Local Plan Part 1 Policy E5 which states that planning decisions will be taken in accordance with the provisions of national guidance, "particularly the sequential and impact tests"

The Policy should reflect the NPPF presumption in favour of sustainable development (paragraph 14) and the related requirement that the need for retail and other main town centre uses should be met in full (paragraph 23) in accordance with the sequential approach, by expressing support for retail development in town centres as first preference and then, where suitable and viable town centre sites are not available, expressing support for retail development on appropriate edge of centre sites with preference for sites that are well connected to the town centre.

The criteria in part B of the policy should be reworded to be consistent with the NPPF, i.e. by deleting criterion (i) which is a consideration that would be taken into account in a development management decision where relevant and is not an appropriate test in this policy; by referring to "suitable" sites being available in criterion (ii) and (iii); and by referring to "significant adverse" impact and not "deleterious" impact in criterion (iv).

No evidence has been presented to justify the requirement for an impact assessment for every retail development outside a town centre that is for over 200sqm gross retail space. This appears onerous particularly when the NPPF identifies that the default threshold is 2,500sqm. Unless the LPA can properly justify this low threshold the threshold should revert to the NPPF default figure and the Policy should state that smaller proposals which involve a significant increase in sales floorspace may also require impact assessment where it is clear that the scale, form and location of the proposal is such that it may be likely to have a significant adverse impact on town centres.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Proposed rewording:

Policy DMTC 1: Town Centre Developments

A) The Council will support 'main town centre uses' in town centres where the development is:

- i) consistent with the scale and function of the centre and
- ii) consistent with other policies of the Local Plan;

where suitable and viable town centre sites are not available, the Council will support retail development on edge of centre sites with preference for sites that are well connected to the town centre.

B) Proposals for 'main town centre uses' outside town centres will be permitted where:

- i) it has been demonstrated that sequential approach has been satisfied which gives preference to suitable available town centre sites and then edge of centre sites;
- ii) it has been demonstrated that there will be no significant adverse impact on existing town centres. As part of this assessment an impact assessment will be required for the following proposals:

- For over 2,500 square metres of retail space, and
- for all other main town centre centre uses individually or in combination, a threshold of 2,500 square metres.

smaller proposals may also require impact assessment where it is clear that the scale, form and location of the proposal is such that it may be likely to have a significant adverse impact on town centres.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Deutsche Alternative Asset Management (UK) Limited		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Colin		
Last name	Burnett		
Company	Burnett Planning & Development Ltd		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Yeading Inset Map - Willow Tree Lane Local Centre boundary

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Plan fails to plan positively and to promote a competitive town centre environment at Willow Tree Lane Local Centre, contrary to NPPF Paragraph 23, because it does not include the existing retail units on the south side of Glencoe Road within the defined centre boundary.

The retail units on the south side of Glencoe Road function as part of the centre due to the excellent pedestrian linkages to and from the Tesco Extra store.

The boundary of the centre should be extended to include this area as shown on the attached plan submitted with these representations.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

see attached plan which identifies the additional established retail area that should be included within boundary of Willow Tree Lane Local Centre

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

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1) What is your gender?

Male Female

2) To which age group do you belong?

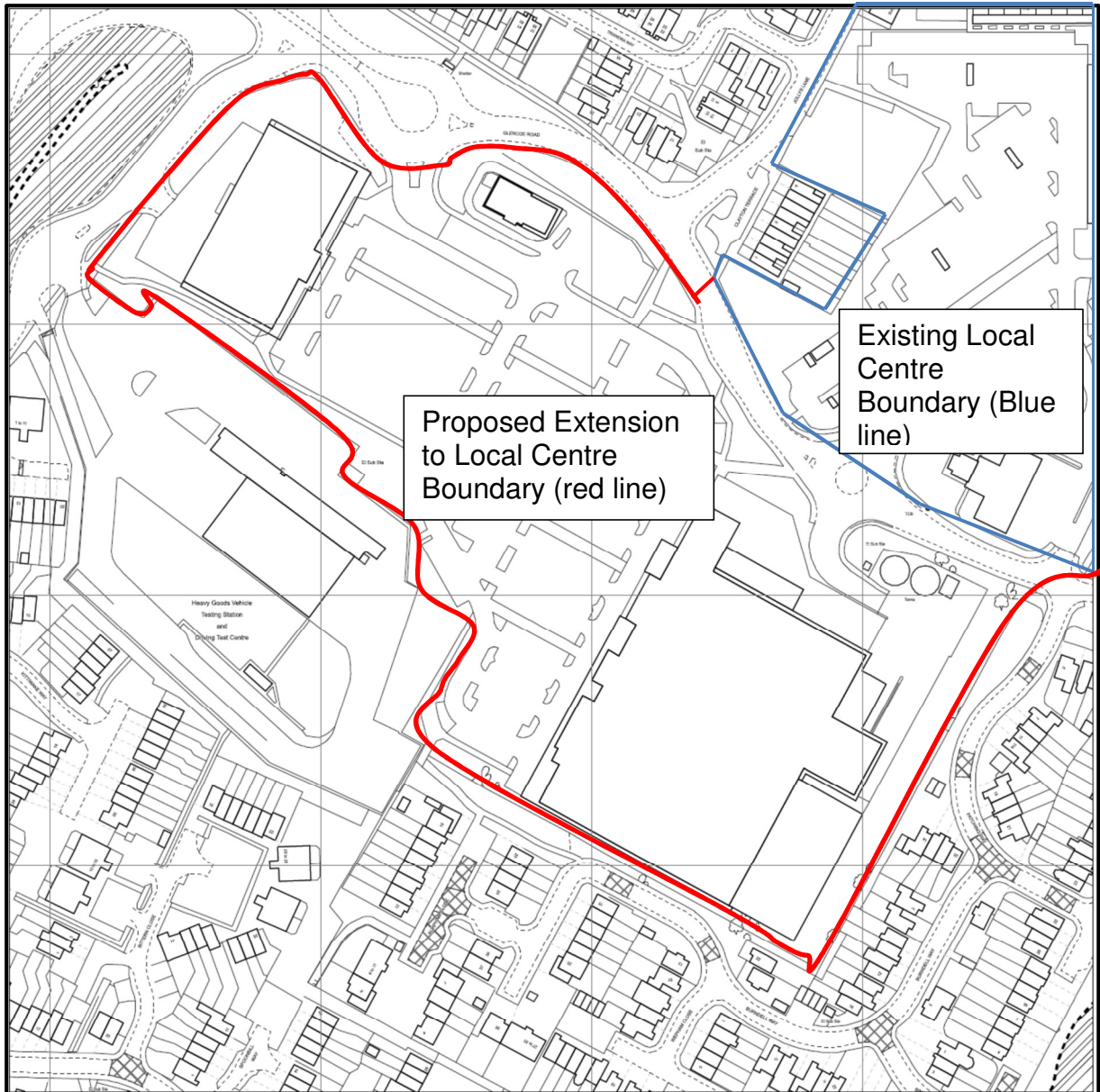
under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



Yeading Policies Map – Proposed Extension to Willow Tree Lane Local Centre Boundary.



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PART A - Your Details (must be completed)

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1. Name and Address	
Title	MR
First name	RAYAN
Last Name	MAHMUD
Organisation (if relevant)	
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	MAPA 2.14: 50 RESERVOIR ROAD. GREEN BELT ASSESSMENT.

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

PLEASE SEE ATTACHED LETTER WHICH EXPLAINS WHY, IN MY OPINION, THE GREEN BELT DESIGNATION OF MY PROPERTY IS NOT SOUND.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

I BELIEVE MY PROPERTY SHOULD BE
REMOVED FROM THE GREEN BELT FOR THE
REASONS SET OUT IN THE ATTACHED LETTER
DATED 30/5/13.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I WOULD LIKE TO DISCUSS MY CASE AT THE EXAMINATION FOR THE REASONS SET OUT IN MY ATTACHED LETTER DATED 30/5/13.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

NO COMMENTS

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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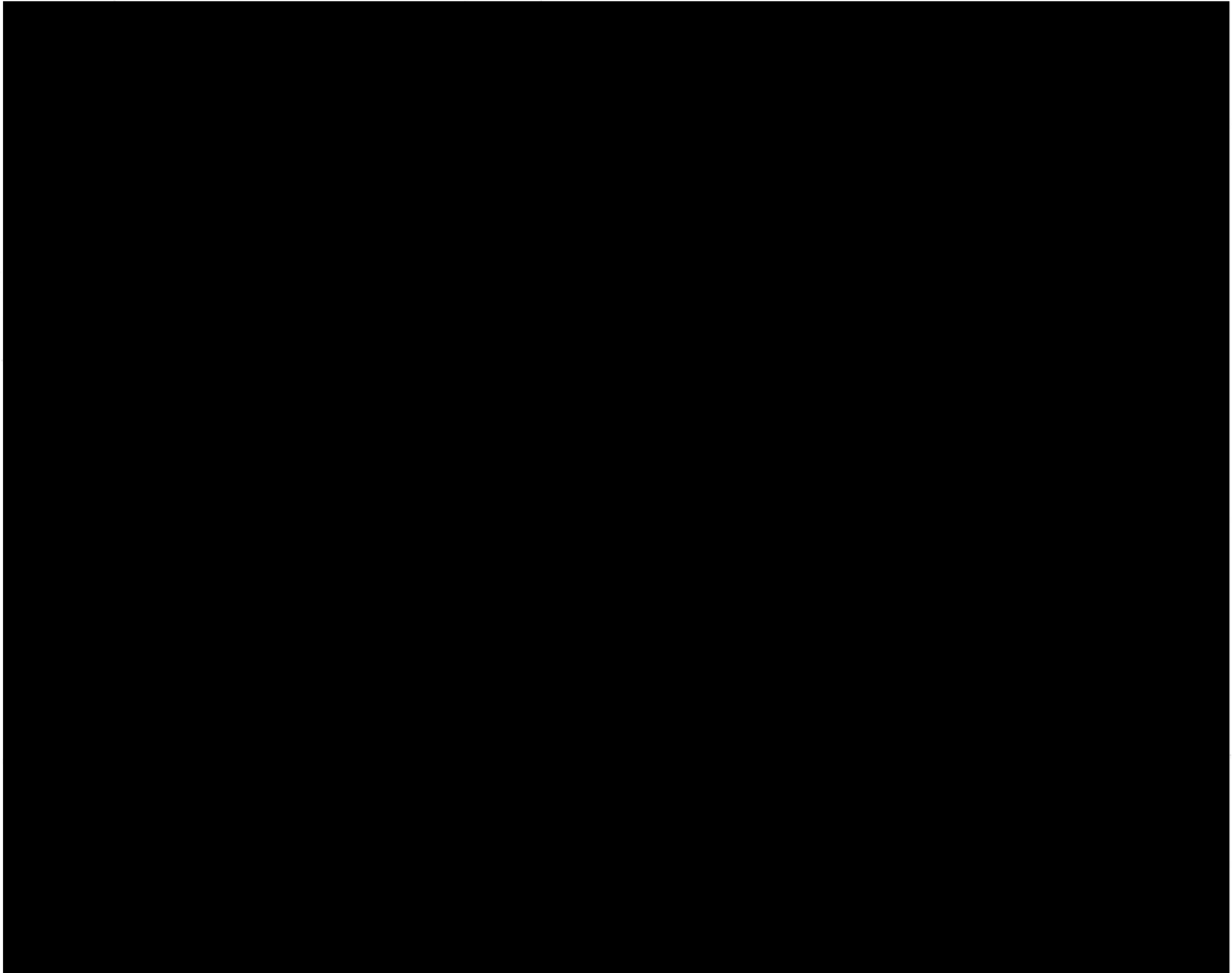
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Monitoring Questions

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MERCER PLANNING CONSULTANTS LTD.



Local Development Framework Team,
Residents Services
London Borough of Hillingdon
3N/02 Civic Centre, Uxbridge
Middlesex,
UB8 1UW

30th May 2013.

Dear Sir/ Madam,

**RE: Public Consultation on Part 2 of the Hillingdon Local Plan (19 April - 31 May 2013).
Notice of Preparation of a Local Plan Document under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 201**

I am instructed by Mr. Rayan Mahmud of 59 Reservoir Road, Ruislip to make a written representation on his behalf to the Part 2 Consultation paper of the Hillingdon Local Plan regarding the property No.59 Reservoir Road, Ruislip, which is in his ownership, and is located within the green belt.

59 Reservoir Road is currently located within the Green Belt. The site is developed and contains a detached two-storey dwellinghouse with associated parking area, hardstanding and garden. To the northeast of the site lies a large car park which belongs to the Waters Edge Public House sited to the southeast, both of these sites are also currently within the Green Belt. All three sites are served by an access road which serves properties within Reservoir Road and terminates with a turning circle at its end adjacent to the public house and the car park. The road is wide and is heavily trafficked by people using it for access to the dwellings in Reservoir Road and the public house and is not what is normally characteristic to a Green Belt location. Despite 59 Reservoir Road being within the Green Belt the area is developed and has a developed character which is reflected by the dwellinghouses sited to the west of the property that are within the defined urban area. No.59 is viewed as a continuation of the designated urban area in Reservoir Road.

The inclusion of the 59 Reservoir Road within the Green Belt is awkwardly shown on the current proposals map where the Green Belt line has been drawn to include this dwelling. A more natural line could be drawn showing the property as a continuation of the urban area with the Green Belt boundary being defined by the woodland to the rear. Given the urban context of 59 Reservoir Road and the

awkwardly drawn Green Belt line the emerging Local Plan Part 2 should carry out a detailed review of the existing built up area/Green Belt boundaries as it is clear, using the above site as an example, that changes are needed.

There is justification to remove the site from the Green Belt as its inclusion within the Green Belt does not meet the tests outlined in the National Planning Policy Framework (2012) set out below.

The NPPF (paras 79 - 80) states that *'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Green Belt serves five purposes:*

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'*

Furthermore Policy EM2 of the Local Plan Part 1 considers that the most important attribute of the Green Belt is its openness and its main purpose within Hillingdon is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments.

Regard must be therefore be paid to both the NPPF and the adopted Hillingdon Local Plan Part 1 in the review of the Green Belt for the Local Plan Part 2 in order to ensure that the Plan and its Proposals Map is consistent with the aims and objectives of these two documents. The Local Plan Part 1 allows for this review under policy EM2 which says that there will be minor alterations to the Green Belt through a Site Specific Allocations LDD.

The inclusion of 59 Reservoir Road within the Green Belt does not check against the unrestricted sprawl of the built up area as the site is already developed as it has a dwelling house and associated development sited on it. No.59 is sandwiched between the defined urban area immediately to its west and by the pub car park to the northeast, which although within the Green Belt, is urbanising in its appearance. The removal of the small site constituting 59 Reservoir Road will therefore not result in any further sprawl of the built up area as it is already contained within a built up area albeit not reflected by the current policy allocation.

Copse Wood and Mad Bess' Wood to the north of 59 Reservoir Road provide a natural woodland buffer to prevent any sprawl from occurring, appropriately both of these woods are located within the Green Belt and prevent Eastcote West from merging with the neighbouring settlement Northwood West to the north west. These woods are also currently afforded protection under the designations of: Nature Conservation Sites of Metropolitan or Borough Grade I Importance, Nature Reserve and as a Site of Special Scientific Interest, presumably these strict designations will be carried forward into the Local Plan Part 2.

The site is located within Greater London and therefore the Green Belt allocation of the site does not act to safeguard countryside from development, the woods however help to maintain the rural character of the area to the north of no.59.

The location of 59 Reservoir Road within the Green Belt also does not help to preserve the setting and special character of historic towns due to its location within a modern residential location on the edge of the urban area.

The retention of no.59 within the Green Belt also fails to assist with urban regeneration as the site is already developed and is within an urbanised location however the designation prevents its regeneration despite the fact that any further development on the site would not harm the open character of the Green Belt. The retention of 59 Reservoir Road within the Green Belt therefore fails to meet the tests for Green Belt designation set out within the NPPF.

Para 84. of the NPPF states that *'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*. The existing Green Belt boundary in relation to 59 Reservoir Road does not promote sustainable patterns of development as the boundary appears awkward as it includes a developed site within the Green Belt whilst the surrounding properties in Reservoir Road are within the defined urban area. The inclusion of 59 Reservoir Road within the Green Belt, whilst all of the surrounding dwellinghouses are in the urban area, is therefore unjustified and objectives of promoting sustainable development within urban areas are not fulfilled.

Within regard to plan making Para 85. of the NPPF states that *'When defining boundaries, local planning authorities should:*

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*

- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'*

The inclusion of no.59 within the defined Green Belt would fail to meet the tests required for designating land within the Green Belt. The site has no impact on the open character of the Green Belt and its release would continue to preserve this open character as the site is already developed and the woodland to its rear ensures the open character of the area is protected whilst providing a check against urban sprawl.

The site does not need to be safeguarded from development as any further development would be viewed as a continuation of the designated urban area, no associated urban sprawl occur given the sandwiched-in location of the site between existing development and the protected woodland which will not come forward for development. Given that no harm would occur to the Green Belt through any future development on the site there is no justified reason to retain 59 Reservoir Road within the Green Belt.

The boundary of the Green Belt should be defined by physical features of the area in accordance with the NPPF, in this location this is easily and naturally achievable as the woodland to the north (that is also afforded various protection under various nature designations) is readily recognisable as the boundary of the Green Belt and will help to preserve its open and rural character and provide a check against urban sprawl. The woodland will remain a permanent feature due to its other nature conservation designations and the release of no.59 from the Green Belt would not put any pressure on the development of this woodland. The tests for Green Belt policy would therefore be met by revising the Green Belt boundary in this location to be defined by the woodland.

The inclusion of 59 Reservoir Road within the Green Belt therefore fails to meet the tests set out for Green Belt allocation in the NPPF and its release would cause no harm to the open character of the Green Belt, result in urban sprawl and would maintain the distinction between urban and rural locations. As such

the current Proposals Map in relation to the Green Belt is therefore unsound as it does not robustly meet the Green Belt allocation tests set out within the NPPF. 59 Reservoir Road should, therefore, be removed from the Green Belt when the boundaries are redefined when drawing up the Proposals Map for the Local Plan Part 2.

Yours faithfully

M. Mercer BSc MA MRTPI
Director
Mercer Planning Consultants Ltd



On behalf of Mr. R Mahmud





HILLINGDON

LONDON

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1. Name and Address			
Title	Mr		
First name	Tony		
Last Name	McGovern		
Organisation (if relevant)	McGovern Brothers (Haulage) Limited		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Junior		
Last name	Moka		
Company	DLP Planning Limited		
Unit		House number	
House name			
Address 1	<input type="text"/>		
Address 2	<input type="text"/>		
Town	<input type="text"/>		
County	<input type="text"/>		
Postcode	<input type="text"/>		
Telephone	<input type="text"/>		
Email	<input type="text"/>		

PART B - Your responses:

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Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	DMP Paras 1.1 / 1.2 and Para 4.2 SA&D Paras 3.1 and 4.1/4.2
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Overview

We are concerned that two significant material considerations - the demonstrable requirement for additional housing in the borough, and the need to provide a spatial context for the Heathrow Opportunity Area - are not currently being addressed in Hillingdon's plan making process.

Housing Supply

The Further Alterations of the London Plan ('FALP') were published in January 2014, and subject to Examination in Public in July 2014.

The FALP re-affirms the importance of increased housing supply in London (Policy 3.3) and, with reference to the GLA's Strategic Housing Market Assessment 2013, sets out average annual minimum housing supply targets for each borough until 2026. The FALP identifies an annual target for Hillingdon (2015-2025) of 559 dwellings, representing an increase of over 31% compared to the annual target of 425 dpa as set out in the London Plan 2011 and Policy H1 of the LP Part 1.

We also note that the Council expressed concern (during the FALP EiP) at the over-reliance placed on the delivery of small sites in the borough (under 0.25 hectares). There is little dispute that the FALP's housing figures, based on up to date demographic and household projections, are a realistic minimum requirement for each borough.

In our view, therefore, the Council must therefore begin planning for these revised figures now, at least by issuing an interim policy supplementing the existing housing targets of the Local Plan Part 1.

In the absence of this, we are therefore commenting on the Local Plan Part 2 to highlight the issue which is relevant to both the Development Management Plan and the Site Allocations and Designations document. Our representations also identify a large site in Harlington that could be brought forward as a contribution to local housing supply.

Heathrow Opportunity Area (HOA)

The FALP also restates the importance of the HOA with an indicative employment capacity of 12,000 and a minimum of 9,000 new homes. Policy E2 of the adopted Local Plan Part 1 states that *'Most of [the employment growth in the area] will be directed towards suitable sites in the Heathrow Opportunity Area, [and other key locations]...'*.

The LP Part 1 states (Policy E3) that LB Hillingdon will work with key partners to prepare and implement a spatial planning framework for the HOA. However, we understand that this document has still not been prepared and the HOA is only mentioned in passing in the draft DMP (Para 8.3).

This is a serious omission which should also be addressed now through the plan-making process.

Conclusion

We believe that the documents are unsound with these key omissions, and therefore fail all four tests of soundness. Please see the response to question 6 setting out how Local Plan Part 2 can be amended to become sound in these four areas.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

1. Preparation of an interim housing policy addressing the revised housing requirements for the Borough, as set out in the FALP.
2. Consequent changes to Development Management Plan paragraphs 1.1 / 1.2 and 4.2 and Site Allocations and Designations paragraphs 3.1 and 4.1/4.2.
3. Insertion of a policy regarding a spatial planning framework for the Heathrow Opportunity Area.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	SA&D Paras 5.2 – 5.7
Table or Figure Number; or	Table of proposed Green Belt deletions (pages 104 – 106)
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Green Belt Deletion Assessment



McGovern Brothers Land Ownership

Frog's Ditch Farm, Shepiston Lane

The Council's 'Green Belt Assessment Update dated September 2013 included an analysis of adjoining CEMEX Frog's Ditch Farm, Shepiston Lane site (see plan above).

This site was considered to perform one out of the five purposes of green belt land, as follows:

- > to assist in safeguarding the countryside from encroachment

Having regard to the circumstances which now prevail, and taking into account of the need to promote sustainable patterns of development, we consider that this land does not merit its current Green Belt designation and should therefore be included in the schedule of proposed Green Belt deletions.

The site is owned by McGovern Brothers (Haulage) Limited and is in use by Hayes Gate Plant Hire for the storage of plant hire, scaffolding, trenching equipment including the parking of associated vehicles and the operation of an associated groundwork. Accordingly the present lawful uses are not consistent with a Green Belt designation.

The adjoining land parcel is owned by CEMEX UK Ltd and these representations should be considered jointly with those made by Agents acting on behalf of CEMEX.

The CEMEX site presently has an agricultural use but has previously been a landfill site, which therefore results in poor agricultural yield. It should also be noted that the land is of limited scale and isolated from other agricultural holdings which further diminishes its value and viability for continued agricultural use.

We suggest that the combined landholding does not fulfil any of the purposes of Green Belt designation, having regard to existing and emerging needs for development. Red Line Plans for both sites are attached in **Appendix 1**.

A detailed Green Belt assessment of the combined site and its wider surroundings has been carried out on behalf of both landowners. This supports our contention that the site no longer serves a Green Belt function in relation to the need for development – in particular to respond to the significant additional housing target for Hillingdon, as identified in the emerging Further Alterations to the London Plan, and to support development associated with the emerging Heathrow Opportunity Area, as set out above.

We comment as follows on the Green Belt purpose ascribed to the site in the 2013 review:

Criterion 3: To assist in safeguarding the countryside from encroachment

The significant boundary to the site created by Shepiston Lane, the line of poplar trees which form the northern boundary of the road corridor and moreover the M4 corridor immediately to the south, effectively sever the site from consideration as part of the open countryside.

Whilst a part of the land is presently in agricultural use, it is demonstrably isolated from any other agricultural holdings and is, overall, of limited scale in its contribution both to openness and to a viable agricultural holding – indeed it can only be accessed along roads which are predominantly urban in nature.

Accordingly we invite consideration that where this site is functionally, visually and physically disconnected from any other area that can be considered to be or perform the function of open countryside, the objection site cannot reasonably continue to safeguard the countryside from encroachment

Paragraph 5.5 advises that minor adjustments to the Green Belt boundary will be undertaken in the Hillingdon Local Plan: Part 2 - Site Specific Allocations Local Development Document (LDD).

Summary

Overall, the combined land at Frog's Ditch Farm, Shepiston Lane does not perform any of the three identified purposes of Green Belt. This representation has demonstrated that its removal from the Green Belt is consistent with the general approach towards the location of sustainable development included within the National Planning Policy Framework.

We therefore consider that the Plan as published is unsound as it fails to provide a suitable framework for the delivery of the scale of development needed in the Borough. Moreover it fails to address the requirement not to preserve land in the Green Belt which does not serve a Green Belt function.

The combined site should therefore be added to the proposed schedule of Green Belt deletions (pages 104 to 106).

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Add the combined site to the proposed schedule of Green Belt deletions (Pages 104 to 107 SA&D)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME17: Development of Land Affected by Contamination
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME17 states that the Council will support the grant of planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

McGovern Brothers (Haulage) Limited broadly support this policy, but suggest that the wording is amended to include reference to financial viability, as set out in Q6 of this form. This proposed change would make Policy DME17 compliant with National Planning Policy Framework paragraph 173, which seeks to ensure viability and deliverability in the planning process.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

McGovern Brothers (Haulage) Limited consider that the wording of this policy should be changed as follows:

*Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented including the remediation of controlled waters. In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected and a S106 planning obligation will be sought, **taking account of the overall financial viability of a proposed scheme.***

This proposed change will ensure that the cost any necessary decontamination works do not unreasonably impact on the viability of a scheme and are taken into account when requesting other financial contributions. Decontamination can help bring forwards previously developed land that would otherwise be unsuitable for development, consequently the cost of this process and additional financial contributions required from the Council should not render a scheme unviable.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME3: Office Development
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME3 states that the Council will seek to accommodate the majority of planned office floorspace growth in Uxbridge town centre, Stockley Park and the Heathrow perimeter.

This policy should be amended to recognize the significance of the Heathrow Opportunity Area, which is recognized in the January 2014 Further Alterations of the London Plan as having an indicative employment capacity of 12,000 and a minimum of 9,000 new homes.

In addition, Policy E2 of the adopted Local Plan Part 1 states that '*Most of [the employment growth in the area] will be directed towards suitable sites in the **Heathrow Opportunity Area...***'.

The draft policy should be modified in accordance with Box Q6 to ensure consistency across emerging and adopted policy.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DME3: Office Development should be amended to read:

A) The Council will seek to accommodate the majority of planned office floorspace growth in Uxbridge town centre, Stockley Park and the **Heathrow Opportunity Area**.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMT2: Highways Impacts
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMT2 sets out requirements for highways impacts that must be met by any development proposal. The proposed requirements set out in bullet points (i) to (v) only address the safe and efficient movement of the highway. It is considered that this policy should be widened so that it is more obviously compatible with the range of highway matters addressed by NPPF paragraph 32.

Draft Policy DMT2 sets out additional requirements that are not consistent with the NPPF and should be modified accordingly.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Amend policy to be consistent with NPPF Paragraph 32.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

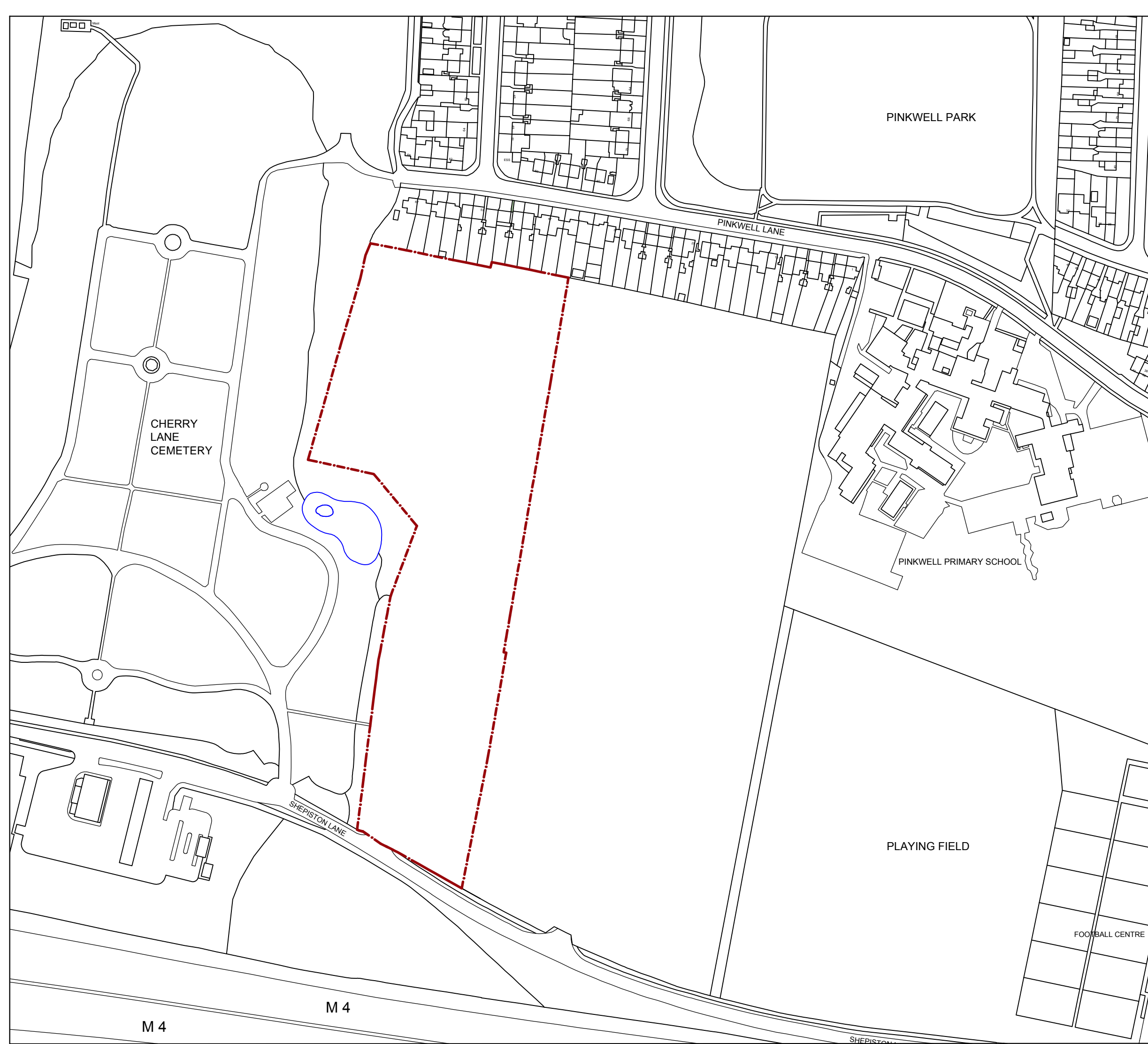
Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingsdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingsdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Appendix 1: Site Plans



GENERAL NOTES

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All dimensions to be checked on site and any discrepancy to be notified to the supervising officer.

No dimension to be scaled from the drawings for construction purposes unless otherwise indicated. All work is to comply with current Building Regulations.

Party Wall etc. Act 1996 would apply and contractor is to ensure that no work is commenced until this formality is completed.

The sole purpose of this drawing is the procurement of Planning Permission and Building Regulation approval and work is NOT to commence before such approvals.

Where this drawing is used for the works, contractor should request at the time of tender, from the tenderer, full specification and schedule of work. To avoid any disputes, this schedule of works in conjunction with the drawings would be used to resolve matters.



PLANNING

REVISION	DESCRIPTION	BY	DATE

Saloria
 CHARTERED ARCHITECTS

Unit 26 Cygnus Business Centre, Dalmeyer Road NW10 2XA
 Tel.: +44 (020) 8451 7833 +44 (020) 8459 9600
 Fax: +44 (020) 8451 3370
 Email: t.vekaria@saloria.co.uk website: www.saloria.co.uk

PROJECT

FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE

SITE PLAN – OWNERSHIP

DATE 20/10/2014 **DRAWN BY** NA
SCALE 1:200 @ A3 **CHECKED BY** LV

DRAWING NO. 130702/11/PO **REVISION**

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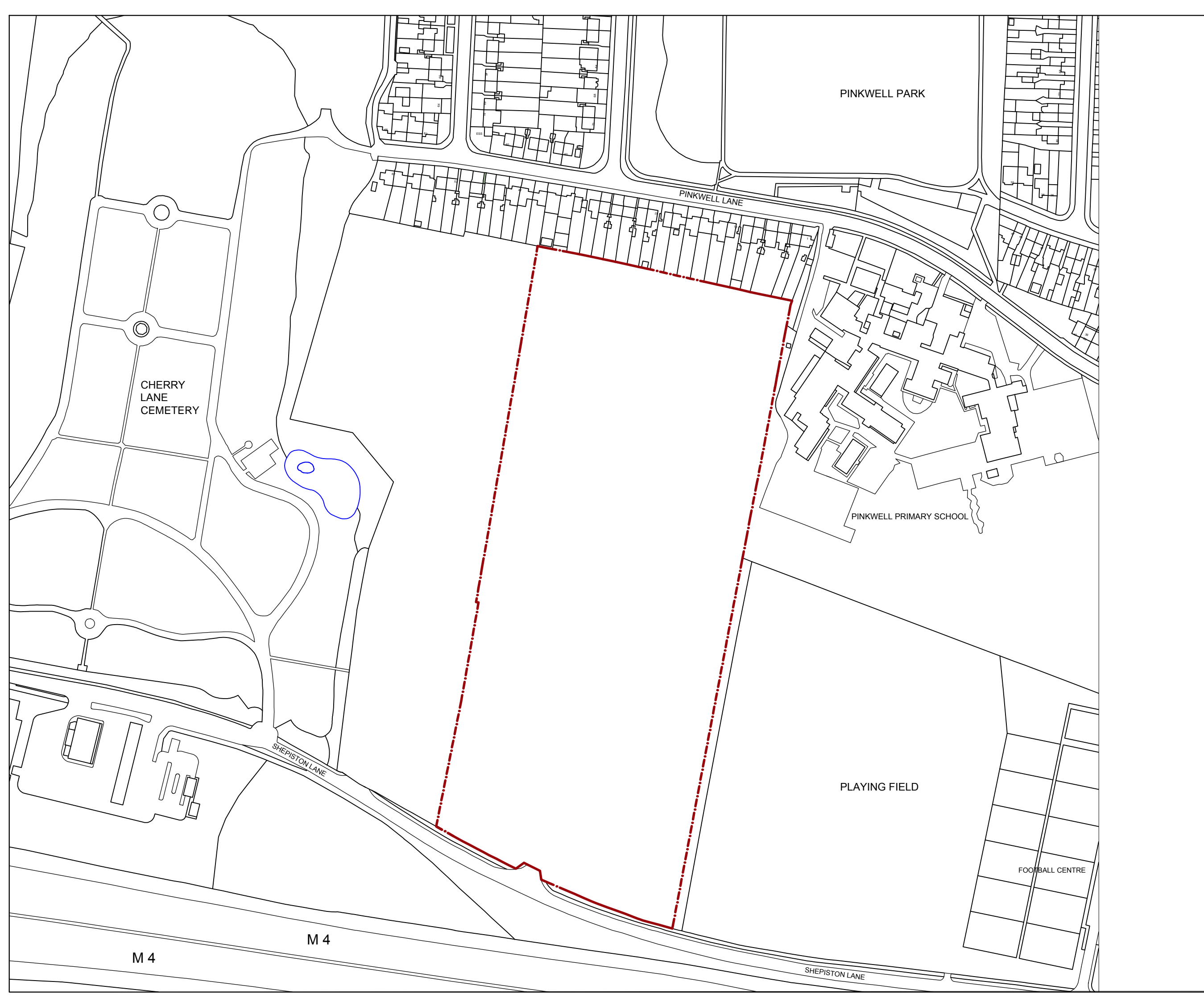
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REVISION	DESCRIPTION	BY	DATE

Saloria
 CHARTERED ARCHITECTS

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 Tel.: +44 (020) 8451 7833 +44 (020) 8459 9600
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PROJECT
 FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE
 SITE PLAN – OWNERSHIP

DATE 20/10/2014	DRAWN BY NA
SCALE 1:200 @ A3	CHECKED BY LV

DRAWING NO. 130702/12/PO **REVISION**

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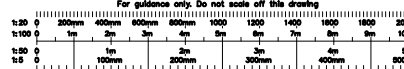
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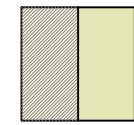
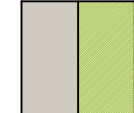
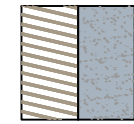

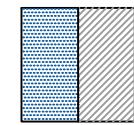
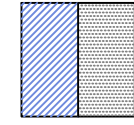


The sole purpose of this drawing is the procurement of Planning Permission and Building Regulation approval and work is NOT to commence before such approvals.

Where this drawing is used for the works, contractor should request at the time of tender, from the tenderer, full specification and schedule of work. To avoid any disputes, this schedule of works in conjunction with the drawings would be used to resolve matters.



PLANNING

LEGEND

-  SITE BOUNDARY
-  PROPOSED RESIDENTIAL DEVELOPMENT
-  PROPOSED BUFFER ZONE
-  PROPOSED HOTEL/COMMERCIAL [B1,B2,B8]
-  ROADS
-  SCHOOL
-  SURROUNDING RESIDENTIAL DEVELOPMENTS
-  CEMETERY
-  OTHER BUILDINGS

REVISION	DESCRIPTION	NO.	DATE
P1		NA	28/10



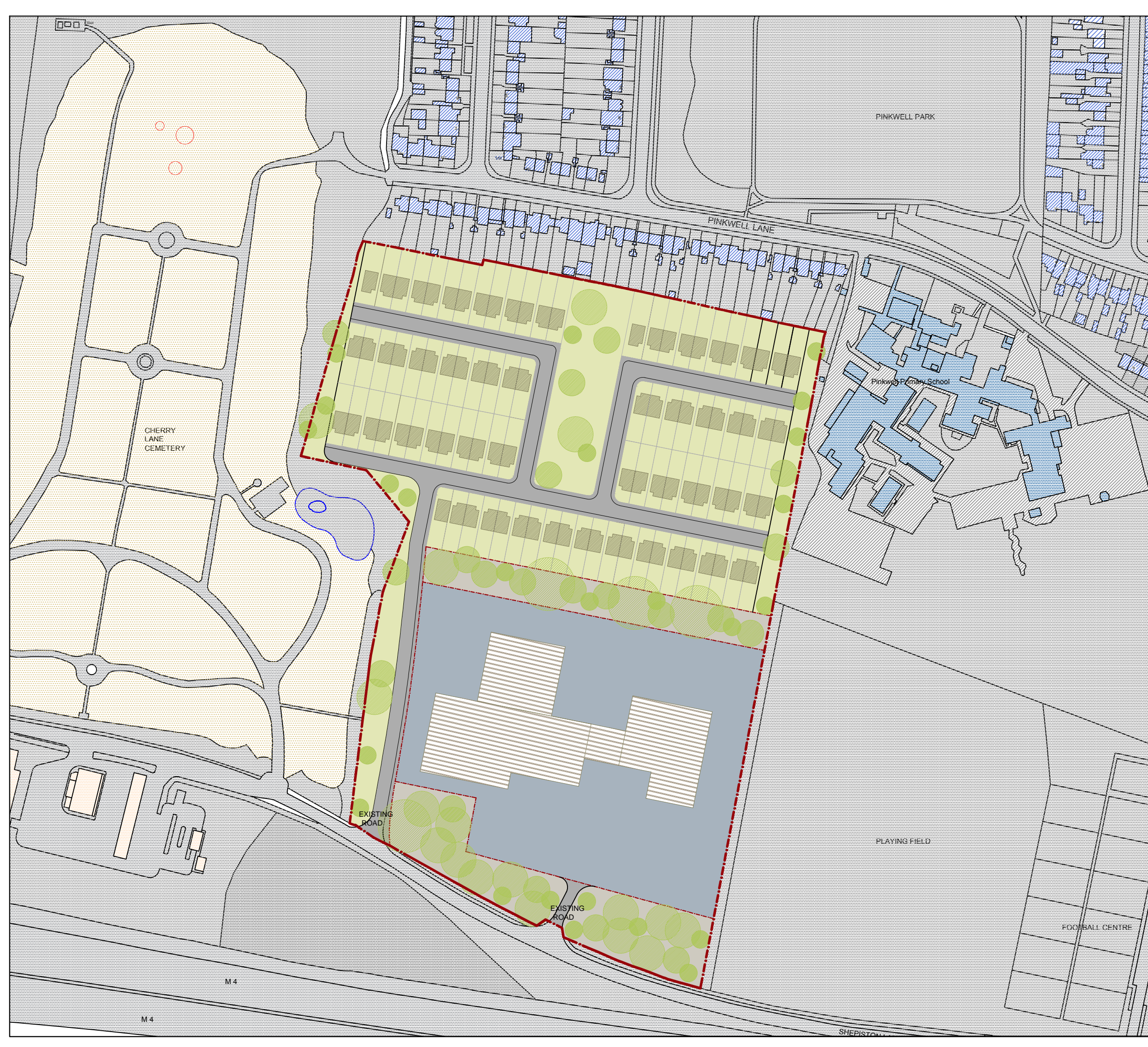
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 Email: t.vekaria@saloria.co.uk website: www.saloria.co.uk

PROJECT
 FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE
 SITE PLAN – OWNERSHIP

DATE 28/10/2014 **DRAWN BY** NA
SCALE 1:200 @ A3 **CHECKED BY** LV

DRAWING NO. 130702/08/P1 **REVISION**



Appendix 2: Visual Impact Assessment

Please see separate sheet



dynamic development solutions™

Our reference: LHL11
Your reference: --
Council reference: --
Inspectorate reference: --
Tuesday 4 November 2014

Planning Policy Team,
London Borough of Hillingdon
3N/02 Civic Centre,
High Street,
Uxbridge,
Middlesex **UB8 1UW**

Dear Sir / Madam,

Local Plan Part 2 Representation

As required by the Council's public consultation on its Local Plan Part 2 Development Management and Site Allocations and Designations documents from 22 September to 4 November 2014, please find attached to this letter our completed representation form on behalf of our client McGovern Brothers (Haulage) Limited for Frog's Ditch Farm, Shepiston Lane. This representation form should be read in conjunction with the representation form submitted by Deloitte Real Estate on behalf of CEMEX UK Properties Limited who owns the adjoining land parcel.

We look forward to receiving an acknowledgement that the representation form is registered. In the meantime, should you wish to discuss the matter further please do not hesitate to contact me on the details shown below.

Yours sincerely

A signature area consisting of three thick, horizontal black bars that completely obscure the text underneath.

Junior Moka
Associate Planner



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	
First name	
Last Name	
Organisation (if relevant)	Brunel University
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Tim
Last name	Sturgess
Company	GVA
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Entire Document
Paragraph Number; or	Entire Document
Table or Figure Number; or	Entire Document
Map Number (Atlas of Changes)	All

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

1. The draft plan has not been informed by an objective assessment of the development needs of the higher education/ research institution sector (including Brunel University), and fails to plan positively to meet such needs in full. As a consequence the draft plan is:

- Not positively prepared
- Not consistent with national policy (including NPPF paragraphs, 14, 17,19, and 20)
- Not justified

.

2. The draft plan proposes to designate land at Brunel University (Site 4 of the Uxbridge Campus) as a Nature Conservation Site of Metropolitan or Borough Grade 1 Importance. We have been unable to to obtain any published evidence to underpin this designation, therefore consider that the plan is not justified in this regard.

.

Refer to supporting letter (dated 03/11/14) and associated enclosures.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

1. Undertake an objective assessment of the development needs of the higher education/research sector and add policies to the plan to meet those needs in full (to include allocating specific sites for development). This should include the allocation of Brunel University's Uxbridge Campus (Sites 1, 2 and 4 - refer to enclosed Site Plan) for higher education/research use, to include a Green Belt boundary review to remove the Green Belt designation that currently applies to this site.

.

2. Delete the proposed designation of Site 4 of Brunel University's Uxbridge Campus (refer to enclosed Site Plan) as a Nature Conservation Site of Metropolitan or Borough Grade 1 Importance. Alternatively, evidence should be prepared to justify the proposed designation.

.

Refer to supporting letter (dated 03/11/14) and associated enclosures.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Brunel University considers the draft Local Plan Part 2 to be unsound.

The University is a significant local economic stakeholder, with substantial development needs over the forthcoming plan period which are not accounted for in the draft plan.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group

Our ref: 02B450664

3rd November 2014

Planning Policy Team
3N/02
Residents Services
Civic Centre
High Street
Uxbridge
UB8 1UW



Dear Sir or Madam

Consultation on Proposed Submission Draft Local Plan Part 2 (Site Allocations and Designations, Development Management Policies, and Policies Map (Atlas of Changes))

We write on behalf of Brunel University regarding the above consultation.

1. Context

Brunel University is a single campus University based in Uxbridge (refer to Site Plan at Enclosure A). It was established in 1966 and has been subject to continuous growth since. It has 13,860 students (2013/14), employs 2,450 staff, has an annual turnover of £187m (2013/14 forecast), and contributes an estimated £445m per annum to the UK economy. As such, it is a significant economic asset. It is recognised as a quality provider of higher education allied to industry with a strong and growing research function, as reflected in the following rankings:

- 226th of universities globally in the 2013/14 Times Higher Education Survey (THES) World University Rankings;
- 25th out of 154 in the NSS 2014 And Number 1 in London for Student Satisfaction (Times League Table);
- 4th out of 14 UK Institutions in the Times Higher Top 100 ranking of higher education institutions that are less than 50 years old (29th in the world);
- No. 1 in the UK in Engineering and Technology for citations from research articles (THES World Ranking 2014/15); and
- 6th in the UK for Engineering, above Cambridge, Bristol and Imperial (THES World Rankings 2014/15).

The University wishes to capitalise on its success and is preparing for significant growth, with student numbers planned to increase to 21,500 by 2022/23 with a focus on growing its research capability, which requires a significant programme of development over the next 5-10 years in order provide the necessary accommodation (expected to comprise the refurbishment of existing buildings together with new development). The growth plans have the potential deliver significant economic and social benefits to the borough and London as a whole.

The University has made the Council aware of its growth plans (and associated development needs) and is deeply concerned that the Local Plan Part 2, as currently drafted, is silent on this matter (as the absence of planning policy support for the principle of development poses a significant risk to the University's growth programme).

2. Soundness of the Draft Plan

We consider the Plan to be unsound on the following grounds:

1. It has not been informed by an objective assessment of the development needs of the higher education/research institution sector (including Brunel University), and fails to plan positively to meet such needs in full. As a consequence, the Plan is:
 - Not positively prepared;
 - Not justified; and



- Not consistent with national policy (including NPPF paragraphs 14, 17, 19, and 20).
- 2. It proposes to designate land at Brunel University (Site 4 of the Uxbridge Campus) as a Nature Conservation Site of Metropolitan or Borough Grade 1 Importance. We have been unable to obtain any published evidence to underpin this designation, therefore consider that the Plan is not justified in this regard.

We consider that the Plan can be made sound by the following changes:

1. Undertake an objective assessment of the development needs of the higher education/research institution sector, and add policies to the Plan to meet those needs in full (to include allocating specific sites for development). This should include the allocation of Brunel University's Uxbridge campus (Sites 1, 2, and 4 – refer to Site Plan at Enclosure A) for higher education/research uses, to include a Green Belt boundary review that removes the Green Belt designation that currently applies to this site.
2. Delete the proposed designation of Site 4 of the University's Uxbridge campus as a Nature Conservation Site of Metropolitan or Borough Grade 1 Importance. Alternatively, evidence should be prepared (and consulted on) to justify the proposed designation.

We provide an explanation below:

3. Higher Education/Research Sector – Development Needs in Hillingdon

The NPPF makes it clear at paragraphs 14 and 17 that in preparing their Local Plans Local Planning Authorities (LPA's) should make every effort to objectively assess the development needs of their area and plan to meet those needs in full (subject to the tests at paragraph 14). It is on this basis that, in order for the Local Plan to be sound, it should be informed by an assessment of the needs of the Higher Education/Research sector (including those of Brunel University) and plan positively to meet those needs unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF when taken as a whole; or
- Specific policies in the NPPF indicate that development should be restricted.

We consider the Higher Education/Research sector to fall within the definition of 'Economic Development' (as per NPPF Annex 2), and therefore the provisions of NPPF paragraphs 18-22 apply. This reinforces paragraph 14's requirement for 'positive' planning, by requiring the planning system to do everything it can to support sustainable economic growth, with planning operating to encourage and not act as an impediment to sustainable growth. Significant weight should be placed on the need to support economic growth through the planning system, with LPA's required to plan proactively to meet the development needs of business and support an economy fit for the 21st century.

The NPPF in-principle requirement for LPA's to support the growth of the higher education/research sector is echoed in the London Plan (Policy 3.18), which requires Local Plans to assess the need for higher education development and secure sites for provision.

This strategic position is reflected at paragraph 9.50 of the adopted Hillingdon Local Plan Part 1, which recognises that the borough contains highly respected higher education institutions. It states that '*Policies will be developed in subsequent LDDs to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Hillingdon Local Plan Part 1. The Council will continue its collaborative working arrangements with these institutions (eg. Brunel University) during the preparation of the Hillingdon Local Plan and during subsequent monitoring and reviews*'. We further note that a 'new masterplan' for Brunel University is listed in the Infrastructure Schedule at Appendix 2 of the Local Plan Part 1. The Council's published Local Development Scheme indicates that the Local Plan will comprise the adopted Part 1 plus the Part 2 documents currently under consultation only. It follows that the 'subsequent LDDs' referred to at 9.50 of the Part 1 Local Plan can only comprise the Part 2 documents currently under consultation, and that therefore the scope of the Local Plan Part 2 should cover the higher education/research sector (and the specific needs of Brunel University) in order to accord with Part 1 (and for the Local Plan as a whole to accord with the NPPF and London Plan).

As noted above, the University has made the LPA aware that it has significant future development needs and has submitted representations to the initial Local Plan consultation opportunity expressing a desire to engage with the Council in the plan preparation process. Following this, the University has made multiple

requests to meet with Council's Planning Officers over the course of 2013-14 but these requests have been refused.

The University remain keen to work collaboratively with the Council to ensure that a sound Local Plan is brought forward at the earliest opportunity, which plans positively for the needs of the higher education/research sector. To inform this, and to helpfully address the current evidence void, the University has prepared an assessment of its development needs (refer to Enclosure B) (this is an update to a working draft which was issued to the Council for discussion in Spring 2014).

The enclosed need assessment indicates that the University has a need for approximately 190,000sqm of new academic, research and student residential accommodation over the plan period (this is over and above the balance of unimplemented development allowed under outline planning consent ref. 532/APP/2002/2237). This is a location specific need: new accommodation must be provided within or adjacent to the existing campus on operational grounds; and land must be suitable for the required use and form of development, be available for development, and either owned by the University or capable of being acquired (within reasonable time and cost constraints).

Sites 1, 2 and 4 at the University's Uxbridge campus (see Site Plan at Enclosure A) are considered to have sufficient physical capacity to accommodate this need (on land which is suitable and available), and it is the University's preference to accommodate growth here. The key policy issue associated with this is that the site is currently designated as Green Belt, which means that NPPF paragraphs 79-92 apply when applying the presumption in favour of sustainable development. The NPPF allows for LPA's to revise Green Belt boundaries as part of Local Plan reviews, where exceptional circumstances apply. It is our view that exceptional circumstances exist in this instance to justify the release of Sites 1, 2, and 4 from the Green Belt on the following grounds:

- There is an objectively assessed need for economic (higher education/research) development;
- This is a locational specific need – there are no suitable/available alternative (non-Green Belt) sites capable of meeting this need; and
- It is our view that the removal of Sites 1, 2 and 4 from the Green Belt would unlikely to be capable of having a significant adverse impact on Green Belt objectives (and would therefore carry limited harm in Green Belt terms). The University has commissioned consultants to prepare evidence to support this point which will be submitted to the Council in follow-up to this representation (we note that a Green Belt Assessment Update was undertaken and published in September 2013 to inform the preparation of the Local Plan Part 2, however, this did not consider land in/around the University).

In addition to evidence associated with Green Belt matters, the University has commissioned consultants to prepare evidence to demonstrate that allocating the site for development is acceptable in respect to other key planning matters including landscape, flood risk and transport. This further evidence will be submitted to the Council at the earliest opportunity. The aim is that this can be used as the basis to work with the Council in drawing up an appropriate site specific policy for the University to be added to the draft Site Allocations and Designations document.

4. Nature Conservation Site of Metropolitan or Borough Grade 1 Importance

Part of our representation concerns land referred to as Site 4 as shown on the Site Plan (see Enclosure A). We understand that the Site Allocations and Designations document proposes an extension to an existing Nature Conservation Site of Metropolitan or Borough Grade 1 importance to include 'Site 4'. As noted above, the proposed designation appears to be unjustified (and is therefore unsound). The university has commissioned consultants to prepare evidence to determine the ecological/nature conservation value of the site which will be issued to the Council in follow-up to this representation at the earliest opportunity. However, in the absence of any evidence to justify the Plan as currently drafted, the proposed designation should be deleted in order to make the plan sound.

5. Summary and Next Steps

Brunel University considers the draft Local Plan Part 2 to be unsound on 2 grounds, the principal ground being that the Plan has not been informed by an objective assessment of development needs of the higher education/research sector (including Brunel University), and does not plan positively to meet the demonstrable development needs of this sector. We have set out details of how the plan can be made

sound – by allocating Brunel University's Uxbridge campus (Sites 1, 2 and 4) for development; removing the Green Belt designation that currently affects the site; and deleting the proposed Nature Conservation designation for Site 4.

The recommended revisions are critical to managing the risks associated with the University's growth plans, which require a policy position to be established in the Local Plan that supports the principle of development at the Uxbridge campus. This is in the context that the delivery of growth at the University offer the potential to realise very significant benefits to the borough and London as a whole.

The Local Plan process allows Local Planning Authorities to consider comments received as part of this consultation stage and to make amendments to this proposed submission version of the plan in advance of submission to the Secretary of State for examination. Therefore, we consider that there remains ample opportunity to consider the recommended amendments outlined above.

The recommended amendments will allow the Local Plan Part 2 to take the opportunity to plan positively to meet the borough's needs and reflect the Government's position, set out within the NPPF, that great importance should be placed on economic development, and the strategic position set out in the London Plan, which recognises the importance of London's world class higher education and research institutes.

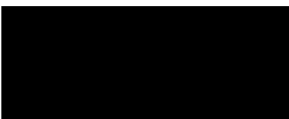
As a key stakeholder, landowner and higher education provider within the LB Hillingdon, Brunel University is keen to work closely with the LPA to bring forward a sound Local Plan that plans positively for the growth of the University in a manner that optimises the benefits to the borough as a whole. It is on this basis that Brunel University request the following:

- A meeting with the Local Planning Authority at the earliest opportunity to discuss this representation; and
- The Council to consider preparing and consulting on a revised draft of the Local Plan Part 2 prior to submitting to the Secretary of State.

Please contact GVA (the University's Planning Advisors):

- Tim Sturgess on 020 7911 2236 (tim.sturgess@gva.co.uk) or
- Nick Alston on 020 7911 2056 (nick.alston@gva.co.uk)

Yours faithfully



GVA

For and on behalf of GVA Grimley Ltd

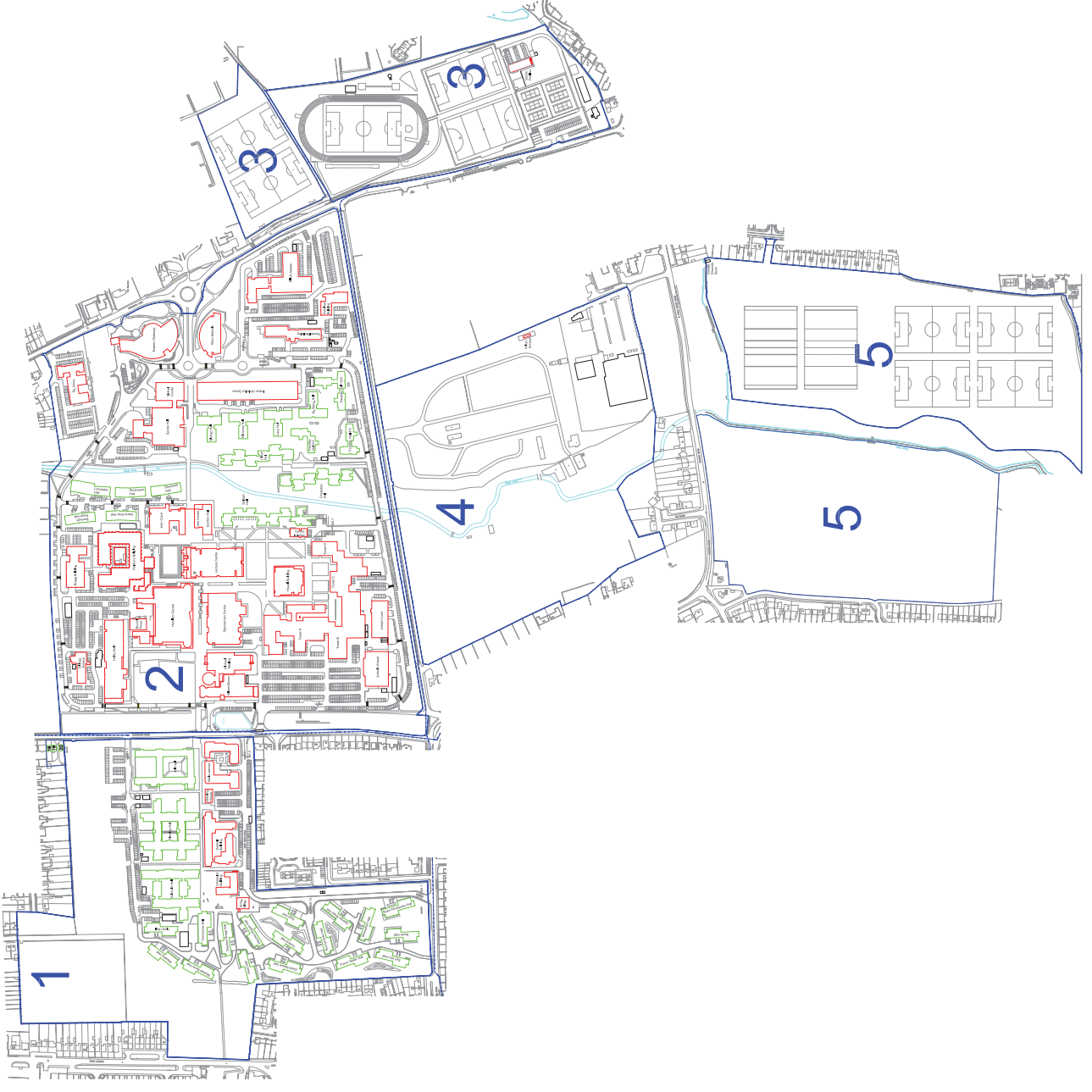
Enclosure A: Site Plan

Enclosure B: Brunel University – Assessment of Development Need

Enclosure A
Site Plan

Notes:

1. It is advised that these notes reference shall be made to the specification for the works and all relevant instruments and applicable drawings.
2. The contractor is responsible for verifying all the setting out dimensions before commencing work.
3. Dimensions shown on this drawing shall not be scaled. Only written or dimensioned dimensions shall be used.



SCHEDULE OF SITE AREAS

- SITE 1**
 - 34.03 Acres
 - 13.78 Hectares
- SITE 2**
 - 66.17 Acres
 - 26.78 Hectares
- SITE 3**
 - 19.82 Acres
 - 8.02 Hectares
- SITE 4**
 - 30.64 Acres
 - 12.40 Hectares
- SITE 5**
 - 42.82 Acres
 - 17.33 Hectares

1	PROJECT	UNBRIDGE CAMPUS	PHASE	
2	CLIENT	Brunel University London	NO.	
3	DATE	15/03/2018	DATE	15/03/2018
4	BY	BRUNEL UNIVERSITY ESTATE	BY	
5	DATE	15/03/2018	DATE	15/03/2018

Brunel UNIVERSITY LONDON

Project: BRUNEL UNIVERSITY ESTATE
 Drawing No: UNBRIDGE CAMPUS ALL SITES

DATE	DESCRIPTION	BY
15/03/2018	ISSUED FOR TENDERS	BRUNEL UNIVERSITY ESTATE

UNBRIDGE CAMPUS ALL SITES

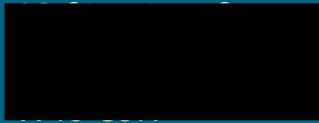
SCALE: 1:2000
 METRES (1:2000)

BRUNEL UNIVERSITY - ALL SITES
 UNBRIDGE CAMPUS
 BRUNEL UNIVERSITY OF THE PEARCE BUILDING
 COPYRIGHT 2018

Enclosure B
Need Assessment



GVA



Brunel University

Assessment of Development Need

Interim Report

October 2014

Prepared By .Nick Alston Status.. Director.....Date January 2014

Reviewed By Nick Alston Status.. Director.....Date October 2014

For and on behalf of GVA Grimley Ltd

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Appendices

Appendix A	Site Plan
Appendix B	Parameter Plan (2004 Outline Consent)
Appendix C	2004 Outline Consent Reconciliation Table and Plan
Appendix D	Aerial Photograph
Appendix E	Student Number Projections
Appendix F	Site Capacity Assessment

1. Introduction

- 1.1 GVA has been instructed by Brunel University (BU) to undertake an objective assessment of its development needs for the next 10-15 years and to advise on how this need can be most appropriately met in planning terms. This paper sets out the outcomes of this assessment and makes the planning case for development on land known as 'Site 4' which is designated as Green Belt in London Borough of Hillingdon's (LBH) adopted Unitary Development Plan (UDP).
- 1.2 The UDP is under review. LBH adopted Part 1 (strategic policies) of its new Local Plan in November 2012, and is currently preparing a draft 'Part 2' Local Plan which will contain development management policies, site specific allocations and an associated policies map (previously known as a Proposals Map). The University's objective is to ensure that the new Plan establishes an appropriately supportive policy basis that allows the planned growth of the University to proceed.
- 1.3 This paper is issued as an 'interim' report in the first instance, to inform discussions with LBH Officers in respect to the preparation of the emerging Local Plan. It will be refined following those discussions to form the basis of representations to the Local Plan.
- 1.4 This paper is structured as follows:
- **Section 2** sets out the context (the education need);
 - **Section 3** provides a description of the site and its planning history;
 - **Section 4** sets out the relevant planning policy context;
 - **Section 5** assesses development need;
 - **Section 6** considers how this need can be best met in terms of site selection (the case for developing Site 4);
 - **Section 7** proposes how the Local Plan can best respond to the identified need;
 - **Section 8** sets out the likely benefits of development; and
 - **Section 9** summarises the paper sets out our conclusions.

2. Context

The UK Higher Education Sector and its Role in UK Economic Success

The Economic Benefits of Higher Education

- 2.1 The contribution of higher education to the UK's economic success has become the focus of greater attention over recent years, providing a skilled workforce, stimulating innovation and supporting start-up businesses.
- 2.2 Higher education forms a core part of the UK's economic infrastructure, contributing to GDP by generating employment and output, and attracting export earnings. Through direct and indirect effects, it is reported that UK universities generated £59 billion of output and provided over 668,500 jobs (equivalent to 2.6 % of all full time employment) in 2007.
- 2.3 As well as providing a skilled workforce, universities and colleges act as anchor organisations in their local economies. Highly unlikely to relocate, they play a distinct role in creating the long-term conditions needed for economic growth. Often as the largest employers in their area, universities boost consumer spending through student numbers, supporting local business, housing and tourism.
- 2.4 Universities contributed over £31 billion to UK GDP in 2007/8, with the off-campus expenditure of their international students and visitors making a further £2.4 billion contribution to GDP. Taken together, this contribution came to over £33.4 billion – equivalent to 2.3 % of UK GDP in 2008 (Kelly et al 2009).
- 2.5 Higher education also has an important role in attracting inward investment. The OECD has argued that for securing foreign direct investment, the world class research infrastructure and skilled labour provided by universities is arguably more important than financial incentives.

The Role of Higher Education in Meeting Economic Growth

Objectives

- 2.6 The role of higher education institutions in supporting economic growth and development has recently taken centre stage as governments around the world push for private-sector led, innovation driven economic recoveries from the economic downturn.
- 2.7 In May 2010 David Cameron stated the Coalition government's commitment to moving away from 'a narrow foundation for growth' of 'just a few industries', to supporting growing industries such as aerospace, pharmaceuticals, high-value manufacturing, hi-tech engineering and low carbon technology. Central to the growth strategy is a drive to rebalance the economy and place it on a more sustainable footing by moving away from a reliance on government and consumer spending towards net trade and investment (HM Treasury 2011). It aims to move the UK away from relying on the financial and banking sectors and towards growth in other economic sectors, particularly the manufacturing sector. It is said that the country will need to 'reindustrialise' in this way for the government to achieve the growth plans set out in the budget (HM Treasury 2012).
- 2.8 For this rebalancing to succeed however growth sectors require a number of external factors, including the conditions for innovation and skilled workers. Higher education is central to these, creating the conditions for innovation by attracting inward investment, developing research infrastructure and supporting the commercialisation of research, and providing the skilled workforce necessary to stimulate the private-sector growth.

A Renewed Role for Higher Education Institutions

- 2.9 In the Government's Plan for Growth, education is described as 'the foundation of economic success'. The Government further stated that "our economy needs to become much more dynamic ... and retooled for a high-tech future, if we are going to create the jobs and prosperity we need for the next generation". This aspiration to use science to underpin economic growth has been met with a growing focus on the importance of universities in research and innovation, nurturing entrepreneurship through spin-off firms,

and supporting the development of a knowledge base in Science, Technology, Engineering and Mathematics (STEM) subjects.

- 2.10 In the UK Government's Higher Education White Paper 'Students at the Heart of the System' (June 2011), it is recognised that universities have 'a much wider role' in developing 'a research infrastructure, and a culture of excellence, that has made the UK a place where many of the most talented researchers in the world want to work'. Universities such as Brunel now provide functions beyond education, expanding into research and development, which is of critical importance to innovation.
- 2.11 Universities are also commonly playing an important role in bridging the gap between higher education and enterprise, with the commercialisation of research through spin-off businesses and licensing, and by establishing and supporting the development of incubator businesses. The Government recognised the importance of this function for regional economic development where universities have the potential to anchor regional industrial clusters by attracting and retaining academic, graduate and business talent, developing networks and nurturing entrepreneurship through spin-off firms.
- 2.12 Universities also have a vital role in developing STEM capabilities that are essential to the UK economic growth strategy. A report to the Select Committee on Science and Technology (2012/2013) highlighted that 'the workforce of the future will increasingly require higher-level skills as structural adjustments in the economy force businesses to move up the value chain. These jobs of the future will increasingly require people with the capabilities that a STEM qualification provides'.
- 2.13 However it is reported that there is currently a deficit in the number of STEM graduates and postgraduate required to fulfil this increasing demand and realise the Government's economic ambitions. The Confederation of British Industry (CBI) reported that 'STEM skills shortages are widespread' with over 40% of employers currently experiencing difficulty recruiting staff with STEM qualifications. Supporting universities to fill the vacancies with high quality STEM graduates and postgraduates will be critical to economic growth.

The Witty Report (2013)

- 2.14 The Witty Report (Encouraging a British Invention Revolution: Sir Andrew Witty's Review of Universities and Growth) stressed that UK universities have an 'enhanced 3rd mission' of promoting regional economic growth. Noting that universities already contribute an estimated £69billion to the UK economy through employment, provision of skills, creation and transfer of knowledge, inward investment and by working with private sector companies, the report charged them with facilitating economic growth as a core strategic goal by acting as local anchor institutions.

The City Growth Commission

- 2.15 The RSA City Growth Commission is a 12 month inquiry into how best to enable the UK's major cities to drive growth and respond to the fiscal and economic changes. The Final Recommendations 'Unleashing Metro Growth' Report of October 2014 identifies the importance of universities, specifically with a focus on science and innovation. The report identifies university education and research are amongst the UK's largest and fastest growing export industries, and world-class universities are well distributed among the largest metros, across the country. Universities have played a key role in transitioning the UK to a knowledge economy through training graduates in advanced skills, and through research that leads to industrial innovation. In leading the UK economy to succeed in global competition for knowledge intensive industries, universities are a vital competitive advantage for metro economies.
- 2.16 The RSA 'Universities' Report of October 2014 outlines policy recommendations which focus on the relationship between universities and cities. It identifies that Universities are key economic assets in every major UK city. University education is a substantial economic activity and employs 320,000 staff directly, nationwide. University education and research have been among the UK's largest and fastest growing industries in recent decades. The higher education sector generated an estimated £10.7bn of export earnings for the UK in 2011-12 and attracts 100,000 new overseas students annually to study in the UK.
- 2.17 Graduates are a foundation of the UK's economic competitiveness with at least a third of the increase in UK labour productivity between 1994 and 2005

attributed to the rising number of people with a university degree. Jobs in higher level occupations, in which graduates skills are most in demand, account for 43% of the current workforce nationally, but higher occupations are forecast to represent 54% of recruitment in the next decade.

- 2.18 Universities also spur stronger economic growth through fostering innovation in several ways, including research partnerships with businesses, technology transfer, spin-off companies, and the entrepreneurial pursuits of students, graduates and faculty. Importantly, universities often have deep historic links with the places in which they are located, whereas other resources for economic growth – such as residents, workers, firms and investors – are more mobile; no UK university has ever relocated out of a metro. Because of this rootedness, the scale of their operations, and related impacts on local economies, universities are often termed ‘anchor institutions’. Metropolitan areas can be confident of the long-term commitment of universities, and the mutual benefits of success. In attracting people, businesses and investment, these areas will benefit from strong universities and universities benefit when their economy prospers and offers an attractive quality of life.
- 2.19 However, despite the world-class performance of UK universities, the report identifies barriers to their continued contribution to UK businesses, including: low levels of investment in research and development (R&D) across much of the UK economy; poor access to (long-term) finance; and below-average management skills in UK businesses. While globally competitive, the UK university system has unique characteristics, which mean that universities need to be understood as institutions with unique attributes.

Investment Potential

- 2.20 In light of the importance attached to higher education, the UK Government is wholly supportive of the sector and has accordingly made substantial amounts of funding available for institutes, especially those with a strong R&D function.
- 2.21 In 2011 the Government announced a programme of Technology Innovation Centres and an innovation and research strategy, with the 2011 White Paper confirming an increase in total funding for higher education institutions by

2014-15. The grant letter to HEFCE identified funding of around £1.5 billion through the quality-related research grant.

- 2.22 While the Department for Business, Innovation and Skills had to adjust to a 25% reduction in its programme and administrative budgets, and 52% reduction in its capital budget, both the Science budget and HEIF funding were protected in cash terms. This highlights the Government's belief that world class research and effective knowledge exchange are core to the economic recovery.
- 2.23 More recently, an additional £200 million in research capital has been provided by Government related to research and its economic impacts. In January 2012 the Universities Minister set out a target for higher education to increase the total knowledge exchange income by 10 per cent over the next three years.
- 2.24 As a successful and growing university in outer London there is a clear opportunity for Brunel to tap into this significant funding pot, with a substantial degree of future investment potential in Hillingdon.

Demographic Trends

- 2.25 There will be increasing pressure on student numbers over the next two decades due to a demographic increase in the number of 18-20 year olds, changes on demographics, and increased demand from potential students from disadvantaged backgrounds. The increase in undergraduate student numbers between 2011 and 2035 has been estimated to be between 26% (using current unmet demand) and 68% (assuming all social groups have the same entry rate). In the short term the Government has removed the cap on undergraduate student numbers which has 'unlocked' an estimated extra 60,000 student places a year.

Brunel University and its Contribution to Local, Regional and National Economic Success

A Successful Education/Research Institution

- 2.26 Brunel University was established in 1966. It has been subject to continuous growth over this period and now has 13,860 students.

2.27 Over the past 50 years the University has established itself as a leading provider of quality higher education allied to industry with a strong culture of research. It is subject to the following rankings:

- 226th of universities globally in the 2013/14 Times Higher Education Survey (THES) World University Rankings;
- 25th out of 154 in the NSS 2014 And Number 1 in London for Student Satisfaction (Times League Table);
- 4th out of 14 UK Institutions in the Times Higher Top 100 ranking of higher education institutions that are less than 50 years old (29th in the world);
- No. 1 in the UK in Engineering and Technology for citations from research articles (THES World Ranking 2014/15); and
- 6th in the UK for Engineering, above Cambridge, Bristol and Imperial (THES World Rankings 2014/15).

2.28 Over recent years BU has sought to align its education and research capabilities more closely with the requirements of the market and the UK's economic growth strategy, which involves it becoming a more research intensive university and placing greater focus on its core subject areas (typically STEM subjects: Science, Technology, Engineering and Mathematics). This approach of building on its existing strengths has ensured that BU has been well placed to take-up nationally significant research opportunities (and access the significant amount of funding available for such work).

2.29 Some examples of BU recent success include the following:

Supporting the Food Sector to Reduce Energy Usage

The new RCUK Centre for Sustainable Energy Use in Food Chains will establish a cross-disciplinary hub of engineers, scientists and industry experts to develop energy-efficient food manufacturing, distribution and retail systems to support the UK Government's target of 80% CO₂ emissions reduction by 2050. The food supply chain alone is responsible for 22% of the UK's greenhouse gas emissions creating 19 million tonnes of CO₂ every year. As the UK's largest manufacturing sector, it employs over 3.5 million people across 196,000 enterprises. In collaboration with Manchester and Birmingham Universities, Brunel is developing innovative approaches, processes and technologies to tackle the imperative to reduce energy demand at all stages of the food chain – from gate to plate. With EPSRC funding of £6 million and a further £6 million from food companies and partner organisations, the Centre will be supported by 33 partners, which include seven major food manufacturers such as Kraft, Heineken and Heinz; four retail partners, including Tesco, Waitrose and M&S; seven equipment manufacturers and suppliers and a number of professional institutions and trade associations.

Advanced Materials for the Automotive Industry

The Brunel Centre for Advanced Solidification Technology (BCAST), at Brunel University, is focused on developing new techniques that will revolutionise sustainability in the production of metal components. Its researchers work on highly advanced casting processes to produce metal products that require very little subsequent machining, radically reducing the amount of energy and materials needed to manufacture high quality parts.

BCAST is also creating new methods for making high quality castings from recycled metals. The aim, on a global level, is to minimize the need for newly-mined materials to support manufacturing. If reliable methods can be found to reuse and 'up-cycle' the billions of tonnes of metal that have already been mined, then the enormous amounts of energy and resources currently spent on disposing of used metal and extracting fresh supplies from the ground can be cut dramatically. For example, in the UK alone we landfill 0.31m tonnes of aluminium per year, representing £775m of direct economic loss and an energy loss equivalent to 11m barrels of oil.

BCAST leads the £9 million EPSRC Centre for Innovative Manufacturing in Liquid Metal Engineering (LiME) (2010-2015) which is conducting fundamental research to understand and control the solidification of liquid metal to enable the development of new advanced materials and highly efficient manufacturing technologies. It also leads the £4.2 million EPSRC funded "Towards Affordable, Closed-Loop Recyclable Future Low Carbon Vehicle Structures" (TARF-LCV) project (2011-2015) contributing to the UK government's strategic Integrated Delivery Programme for the development of low carbon vehicles.

JLR are a lead industrial partner in LiME and are developing a strategic partnership to establish a scale up facility for resource efficient technologies for high performance alloys. This will help bridge the gap between lab-proven technology and industrial application to accelerate the industrial take-up of fundamental research undertaken at Brunel.

Engineering a Resilient Energy and Transport Infrastructure

NSIRC is the world's first educational establishment offering industry-driven research and postgraduate degree programmes in structural integrity. Set up to address the shortage of structural integrity engineers worldwide, the centre is a unique collaboration between TWI, lead academic partner Brunel University, together with Manchester University, Cambridge University and industry partners.

With support from the UK Department of Business, Innovation and Skills, TWI are constructing a multi-million pound postgraduate engineering facility integrated within the expanded TWI headquarters, at Granta Park, Cambridge as part of this £150m initiative to establish a Structural Integrity Research Foundation (SIRF). In addition, Brunel has secured funding from the Higher Education Funding Council for England (HEFCE) to procure specialist research equipment to be housed in the facility and used by NSIRC to carry out fundamental research and programmes of postgraduate training at Masters and doctoral level. The key outputs arising will be industry-ready engineers and scientists in structural integrity disciplines such as fail-safe design, flaw evaluation, corrosion prevention and structural health monitoring, and new techniques and technologies to address the long term structural integrity challenges facing the engineering, energy, transport and aerospace sectors.

NSIRC combines industrially driven academic excellence to address the need for innovation, while delivering a supply of appropriately qualified staff to work across the supply chain and generate very significant economic benefits, both to industry and the UK as a whole.

Brunel's latest collaboration with TWI marks a truly pioneering approach to securing global economic resilience. In November 2012, the Higher Education Funding Council for England (HEFCE) announced funding of £15 million to Brunel in support of plans to form a National Structural Integrity Research Centre (NSIRC). NSIRC will be based at TWI's headquarters outside Cambridge in a new building to be constructed with support from the Department of Business, Innovation and Skills Regional Growth Funding. Lead partners, TWI and Brunel, along with a consortium of leading academic and industrial partners will carry out research programmes, train postdoctoral students and conduct contract R&D specifically in the field of structural integrity.

The facility will provide UK industry with world-class engineers who can lead the development of new, safe, world-leading products in diverse industries, including oil and gas, energy generation, renewables and transport. We estimate that in addition to the environmental and social benefits resulting from the avoidance of engineering failures, the direct economic benefit brought by those graduating from the NSIRC after the first ten years of its operation will be in excess of £350m. This can be multiplied to more than £3.5bn when considering the benefits of the work the qualified engineers will undertake for industry.

A Valuable Economic Asset

2.35 The University plays a significant role in the local economy:

- The University is a key local economic asset for Hillingdon, playing a key role in the borough's 'knowledge economy' base.
- The economic performance of Hillingdon is driven by its strong knowledge economy base attributed to the biotech cluster
- For the 2013/14 year, the University has 13,860 students (73% are undergraduates and 27% post-graduates). 21% of students are from outside of the UK/EU and approximately 7% are from LBH;
- It employs approximately 2,450 full/part-time staff, of which 36% live in LBH;
- It attracts around 26,500 visitors per annum (2013) in conjunction with academic related conferences, hospitality events and summer schools;
- It has an annual turnover of £179m (2011-12), £184m (2012/13) and £187m (2013-14) (forecast). Universities UK estimate that for every £1 of university turnover a further £1.38 is generated in the other sectors of the economy. This puts the University's annual contribution to the economy at around £445m (2013-14);
- In 2009/10, the University was part of a £4.6m supply chain with Hillingdon businesses, providing services to the value of £1.4m and purchasing £3.2m of products and services from Hillingdon companies and agencies.
- Over £300m has been invested in the capital projects in the period 2006/7-11; and
- It has an active collaboration programme with local further education colleges and secondary/primary schools.

The Future

2.36 Brunel University is clearly a success in terms of an education/research institution and as a local economic driver. The University wishes to capitalise on this success and is preparing for a further period of growth. Its current Transformational Change Programme is designed to enable this vision.

2.37 The aim is to cement the University's position in the top 3rd of UK higher education institutions. It has prepared a strategic plan for the next 5 years which focuses on the significant growth of its research capability (which includes post-graduate study), alongside modest growth of undergraduate education. It has furthermore worked up headline details for longer term

growth (next 10-15 years) for estates/planning purposes which continues this expansion trend.

- 2.38 In terms of student numbers, it plans to increase these to around 21,500 by 2022/23 (from around 13,860 in 2013/14). Ensuring that the University has suitable accommodation to meet its operational growth requirements is essential. This will require a significant development programme comprising the refurbishment of existing buildings together with new development and public realm upgrades to the Uxbridge campus.
- 2.39 The University aims to increase the proportion of students housed on-campus (in order to reduce impacts on the local community and housing market). At present all first year and masters students are offered a place on campus, however the aim is to extend this to third year and a proportion of research students. This strengthens the University's educational offering, as a greater proportion of students will be on campus, and is attractive to prospective students (especially from overseas) as it emphasises the University's advantage as a 'campus university in London'.

3. The Site and Planning History

- 3.1 Brunel University operates from a 78 hectare campus located approximately 1km to the south of Uxbridge town centre, within the administrative area of the London Borough of Hillingdon (LBH). It is the only single-campus based university in London. Development has been brought forward incrementally in a planned manner, in accordance with a series masterplans the most recent one having been granted outline planning consent in 2004.
- 3.2 The campus is divided into 5 'sub-sites' (refer to plan at Appendix A):
- **Sites 1 and 2** lie either side of Cleveland road and accommodate the majority of the University's built accommodation. This comprises an intensely developed mix of academic/teaching space, specialist research facilities and student housing (halls of residences) across a site area of around 40ha. Existing buildings date from the 1960's onwards.
 - **Site 3** lies to the east of Kingston Lane and **Site 5** lies to the south of Church Road. These accommodate the majority of the University's outdoor sports facilities, which include extensive areas of playing fields (sites extend to approximately 25ha).
 - **Site 4** extends to approximately 12.4ha and is located immediately to the south of Site 2. Part of the site (approximately 1.6ha) accommodates a series of single storey buildings and associated car parking currently used as a garden centre (trading as 'Hillingdon Garden Centre'). The remainder of the site is unused (this land was formerly used as a market garden – there are remains of greenhouses, structures and surface infrastructure associated with this former use/development). The land has been vacant for an extended period of time and is fenced off (there is no public access).
- 3.3 The main vehicle access is via Kingston Lane and the site is served by numerous bus routes which provide connections to the tube network at Uxbridge and national rail at West Drayton. The site has a Public Accessibility Level (PTAL) rating of 2 (poor).
- 3.4 Existing university buildings extend to approximately 233,851sqm (gross internal area) (excluding the garden centre), comprising approximately 125,120sqm of teaching, research and support facilities and 108,731sqm of student

housing. This equates to a gross floorspace to plot size ratio (plot ratio) of around 0.58.

- 3.5 The River Pinn passes north to south through the centre of the University Campus (affecting Sites 2 and 4). The Environment Agency Flood Map (see Parameter Plan at Appendix C) indicates that parts of Sites 2 and 4 are designated as Flood Zone 2/3, while the remainder of the campus is Zone 1.

Planning History

- 3.6 In 1990, the University prepared a Masterplan for the Uxbridge campus to cover development requirements up to 2000. This was granted outline planning consent in 1992.

- 3.7 The University proceeded to prepare a further masterplan for Sites 1 and 2 in the early 2000's, to guide development over the proceeding 10-15 years. This was granted outline planning consent in 2004 (application ref. 532/APP/2002/2237). The description of development is as follows:

'Brunel University master plan proposals comprising erection of 48,064 sq.m of new academic floorspace, 69,840 sq.m of new student residential accommodation, ancillary floorspace and infrastructure, provision of 645 additional parking spaces, improved access from Kingston Lane, new access from Cowley Road, highway improvements to Cleveland Road, improved pedestrian and cycle routes, landscaping and environmental improvements (involving demolition of 18,600 sq.m of existing floorspace) (outline application)'

- 3.8 The Parameters Plan approved under this consent is enclosed at Appendix B.
- 3.9 The 2004 Masterplan has now been partially implemented. The table enclosed at Appendix C provides an overview of the elements that have been implemented and confirms the elements which remain to be built-out. All of the approved student accommodation (69,840sqm) has been implemented, however a balance of 20,546sqm (43%) of the academic floorspace remains to be implemented.

- 3.10 An application was submitted in March 2012 (Ref: 532/APP/2002/2237) to extend the period in which reserved matters applications can be submitted. This application is pending determination.

4. Planning Policy Context

- 4.1 The policies set out in the emerging Hillingdon Local Plan (Part 2) must be in general conformity with policies set out in the National Planning Policy Framework (NPPF) and the London Plan, and should be consistent with policies in the adopted Hillingdon Local Plan (Part 1). Accordingly, this existing policy context establishes a 'framework' within which the new local plan policies must be prepared.
- 4.2 This section provides an overview of this existing policy framework (as relevant), which acts as the policy context for the planning case set out in subsequent sections.

The National Planning Policy Framework

- 4.3 The NPPF sets out the Government's overarching planning policies for England. It must be taken into account by local planning authorities in the preparation of local plans and is a material consideration in planning decisions.
- 4.4 The key objective of the NPPF is to achieve sustainable development, which is defined by the policies set out in the NPPF. It confirms a general presumption in favour of sustainable development which for plan-making means that:
- Local Planning Authorities should positively seek opportunities to meet the development needs of their area; and
 - Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid changes, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
 - Specific policies in the NPPF indicate that development should be restricted.
- 4.5 The above 'presumption' establishes the overarching starting point for determining the acceptability of development at the University. Moving beyond this, the principal NPPF policy issues of relevance relate to economic development and Green Belt, as discussed below:

Building a Strong, Competitive Economy

- 4.6 As discussed in earlier sections, the University acts as an important driver of the local and regional economy. The NPPF establishes very clear in-principle support for economic development, and therefore the growth of the University.
- 4.7 Proactively driving and supporting sustainable economic development is identified in the NPPF as a core land use planning principle which should underpin both plan-making and decision taking (para. 17). This core principle is bolstered by Paragraph 19 which states that the Government's expectation is that the planning system should do everything it can to support sustainable economic growth. It requires significant weight to be placed on the need to support economic growth through the planning system which is expected to operate to encourage and not act as an impediment to sustainable growth.
- 4.8 When preparing Local Plans, paragraph 21 of the NPPF requires local planning authorities to do the following:
- Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;
 - Identify strategic sites for local and inward investment to match the strategy and meet anticipated needs over the plan period;
 - Support existing business sectors, taking account of whether they are expanding or contracting; and
 - Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high-technology industries.

Green Belt Protection

- 4.9 The principal policy constraint to development is the Green Belt policy designation that covers the entire site (a UDP policy).
- 4.10 The NPPF confirms that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts being their openness and their permanence (paragraph 79).
- 4.11 Paragraph 80 of the NPPF confirms the five purposes of Green Belt land, as follows:
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- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.12 Paragraph 83 requires Green Belts boundaries to be established in Local Plans. Once established, it states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

4.13 If Green Belt boundaries are to be reviewed, paragraph 84 of the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development. It requires local planning authorities to:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

4.14 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances (NPPF, paragraph 87). The NPPF confirms, at paragraph 89, that the construction of new buildings in the Green Belt should be regarded as inappropriate.

The London Plan

- 4.15 The London Plan forms part of the development plan affecting the site and, at a local level, London Boroughs must ensure that their Local Plans are in general conformity with it. The current London Plan was adopted in October 2011 and is currently under review. The Mayor published a Revised Early Minor Alterations document in October 2013 and is currently consulting on Further Alterations (January 2014). As per the NPPF, the key relevant London Plan policy considerations relate to education/economic development and Green Belt, as discussed below:

Education/Economic Development

- 4.16 The London Plan acknowledges the link between London's status as a pre-eminent global business location and the importance of London's world class higher education and research institutes. It recognises that higher education is an important economic sector in its own right and establishes clear in-principle policy support for the growth of education/research institutions.
- 4.17 One of the key objectives of the Plan is to ensure London is '*an internationally competitive and successful city with a strong and diverse economy and an entrepreneurial spirit that benefits all Londoners and all parts of London; a city which is at the leading edge of innovation and research and which is comfortable with – and makes the most of – its rich heritage and cultural resources.*'
- 4.18 It states at paragraph 3.107:
'Higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, e.g., incubation space and business support services. It is also a major employer and attracts major international companies able to benefit from the universities' research reputation, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive (Policy 4.12).'

- 4.19 Policy 3.18 requires Boroughs to *'support and maintain London's international reputation as a centre of excellence in higher education.'*
- 4.20 Policy 4.10 relates to new and emerging economic sectors and requires Borough and stakeholders to:
'give strong support for London's higher and further education institutions and their development, recognising their needs for accommodation and the special status of the parts of London where they are located...'
- 4.21 Paragraph 4.54 states:
'The Mayor strongly supports measures to secure and develop London's leading role as a centre of higher and further education of national and international importance. These are important economic sectors in their own right with a key part to play in developing London's world city offer, as well as having considerable potential for greater synergies in fostering innovation....'
- 4.22 Table 2.1 identifies outer London business locations with specialist strengths (e.g. higher education, media, strategic office, logistics / other transport related uses) which potentially or already function about the sub-regional level and generate growth significantly above the long term outer London trend. The intention being that these would complement the network of town and other centres. Uxbridge is identified as a potential outer London development centre in relation to higher education.
- 4.23 Policy 2.1 seeks to ensure that London 'retains and extends its global role as a 'sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy'.
- 4.24 Policy 3.8 (Housing Choice) requires boroughs to address strategic and local requirements for student housing meeting a demonstrable need by working closely with higher education stakeholders and without compromising capacity for conventional homes. Paragraph 3.52 identifies a need for around a further 10-27,000 student bedspaces in the period to 2021.

Green Belt

- 4.25 Policy 7.16 of the London Plan relates to Green Belt land. It states that the Mayor strongly supports the current extent of London's Green Belt and its protection from inappropriate development. It states that the strongest
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protection should be given to London's Green Belt and that inappropriate development should be refused, except in very special circumstances.

Draft Further Alterations to the London Plan (January 2014)

- 4.26 The Mayor published draft further alterations to the London Plan for consultation in January 2014. This maintains its firm support for the growth of the higher education sector, but of note is the revised figures for student housing need which indicate a requirement for 20-31,000 bedspaces in the period to 2025. The Mayor has set up an Academic Forum to help plan for student housing needs in London.

Hillingdon Local Plan (Part 1 – Strategic Policies)

- 4.27 LBH's Local Plan Part 1 (previously known as the Core Strategy) was adopted in November 2012. It establishes an adopted strategic policy basis within which site specific allocations and development management policies should be prepared. As with national/regional policy, the key relevant issues are education/economic development and green belt.
- 4.28 The Local Plan confirms that Uxbridge is the main urban centre in Hillingdon and is classified as a Metropolitan Centre. At Table 5.4, it describes Uxbridge as follows:
- 'Uxbridge has an office stock of around 205,000 sq.m, the fourth largest concentration in outer London, and is a key centre for the office market in West London. A number of operators have their headquarters or European headquarters in Uxbridge which has cluster strengths of pharmaceuticals and IT companies, business support services and food sectors. Businesses are attracted by good road access, the quality of the townscape and service provision, availability of suitable premises, Brunel University and the local skills base.' (our emphasis)*
- 4.29 Paragraph 9.50 of the Local Plan acknowledges that Hillingdon is home to a number of highly respected educational institutes. It states that policies will be developed in subsequent Local Development Documents 'to ensure that a high standard of teaching can continue to be provided in these establishments over the period of the Local Plan and that LBH 'will continue its collaborative working arrangements with these institutions (e.g. Brunel

University) during the preparation of the Local Plan and during subsequent monitoring and reviews.'

4.30 Paragraph 8.20 of the Local Plan acknowledges that the most important attribute of Green Belts is their openness. It goes on to state that the main purpose of Hillingdon's Green Belt is:

- to keep land open and free from development;
- to maintain the character and identity of individual settlements; and
- to make a clear distinction between rural and urban environments.

4.31 The Local Plan aims to create sustainable communities by concentrating new development in urban areas and local town centres. Paragraph 8.20 states that the Green Belt's role is '*to help reinforce this strategy by strictly controlling development in the open countryside*'. In this context, it is important to note that Site 4 is not within the open countryside nor within a rural environment.

4.32 Site 4 is however within an area identified by the Local Plan (Map 8.1) as a 'Green Chain'. Paragraph 8.22 defines Green Chains as habitats linked by natural and man-made corridors that enable flora and fauna to migrate into the centre of London. It notes that the green links between sites include public footpaths, bridleways, canals, rivers, streams and tree lined streets and road verges, all of which contribute to the green network within the borough.

4.33 Local Policy EM2 relates to Green Belt, Metropolitan Open Land and Green Chains. It states:

'The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies.

Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a

visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.'

The LBH Unitary Development Plan (1998)

- 4.34 LBH's Unitary Development Plan (UDP) was adopted in 1998 and is now out-of-date. The policies contained in the Plan are under review as part of the preparation of the new Hillingdon Local Plan (Part 2) and are expected to be deleted following adoption of the new plan. Accordingly, these policies are not relevant for the purposes of preparing the new plan. Notwithstanding this, headline details of key policies are provided below for the purposes of context.
- 4.35 The key 'Saved Policies' are Policy PR22, which relates specifically to Brunel University, and Policies OL1, OL4 and OL5 which relate to development within the Green Belt.

Brunel University (Site Specific Policy)

- 4.36 Saved UDP Policy PR22 relates specifically to Brunel University, and which states:
- 'Brunel University Campus shall be reserved for development associated with the University's functioning as a centre for academic learning and research. In order to safeguard the function and open nature of the Green Belt across the campus, infill and development will be encouraged on Site 2 providing it does not harm the environment. Development on the predominantly open land on Site 1 will be acceptable where (i) the proportion of developed to undeveloped land is such that the site retains its open character; (ii) the land is able to sustain its ecological and nature conservation interest; and (iii) development does not detract from residential amenity. Development of Site 3 and Site 5 will be restricted to outdoor sport and informal recreational uses which retain the existing open character.*

In considering any proposal at the University, the following objectives will be taken into account:-

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- (i) to preserve and enhance the ecological interest of the land including establishing nature conservation and wildlife corridors;
 - (ii) to seek public access to the campus where this does not compromise the University's operational requirements or the safety and security of the students and staff;
 - (iii) to provide both on and off-site road and junction improvements;
 - (iv) to augment existing tree belts along the northern and western boundaries on Site 1 and provide additional planting and landscaping where appropriate elsewhere;
 - (v) to provide adequate on-site car parking;
 - (vi) to enhance the existing footpath network on the campus;
 - (vii) to protect local residential amenity.'

Green Belt

4.37 LBH's policy on development within the Green Belt is set out in Saved Policy OL1. This states:

'Within the Green Belt, as defined on the Proposals Map, the following predominantly open land uses will be acceptable:

- (i) agriculture, horticulture, forestry and nature conservation;*
- (ii) open air recreational facilities;*
- (iii) cemeteries*

The local planning authority will not grant planning permission for new buildings or for changes of use of existing land and buildings, other than for purposes essential for and associated with the uses specified at (i), (ii) and (iii) above. the number and scale of buildings permitted will be kept to a minimum in order to protect the visual amenity of the Green Belt.

Limited infilling or redevelopment of Major existing developed sites shown in the Proposals Map and set out in Table 3.3 below and in accordance with proposals adopted in this Plan is considered appropriate provided it complies with the criteria detailed in paragraphs C3 to C8 of Annex c to PPG2.'

4.38 Since Policy OL1 was adopted in 1998, the national planning context had moved on and PPG2 has since been replaced by the NPPF (2012). However, the planning policy position in relation to Green Belt land has predominately remained the same.

4.39 UDP Table 3.3 identifies Brunel University as a 'Major Developed Site in the Green Belt'.

4.40 Saved UDP Policy OL4 relates to intensification or enlargement of existing buildings within or adjacent to the Green Belt. It states that LBH will only permit such development where:

(i) the development would not result in any disproportionate change in the bulk and character of the original building;

(ii) the development would not significantly increase the built up appearance of the site;

(iii) having regard to the character of the surrounding area the development would not injure the visual amenities of the green belt by reason of siting, materials, design, traffic or activities generated.'

4.41 In relation to new development adjacent to the Green Belt, Saved Policy OL5 states that LBH will only 'permit development adjacent to or conspicuous from the Green Belt if it would not injure the visual amenities of the Green Belt by reason of siting, materials, design, traffic or activities generated.'

Summary and Conclusions

4.42 National, regional and Local Plan (Part 1) policies establish a framework within which Local Plan Part 2 policies should conform.

- The planning system in England is underpinned by a presumption in favour of sustainable development. For plan-making this means that Local Planning Authorities should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
 - Specific policies in the NPPF indicate that development should be restricted.
- Policy recognises that the higher education constitutes an economic sector in its own right. The planning system is required to do everything it can to support economic development, and should operate to encourage and not act as an impediment to growth. Significant weight

should be placed on the need to support economic growth through the planning system.

- This firm policy support for growth (on economic development grounds) conflicts with the Green Belt policy designation that affects the site which seeks to prevent 'inappropriate development' on such land. Changes to Green Belt boundaries should be undertaken as part of Local Plan reviews, as acknowledged in the adopted Local Plan Part 1 which allows for boundary reviews to be undertaken in the Part 2 Local Plan.

4.43 In accordance with the above, it is clear that the emerging Hillingdon Local Plan should support the growth of the University and, more specifically, include policies that plan positively to meet the University's development needs in full. With this principle in mind, the next section assesses the University's development needs are.

5. Development Need

- 5.1 This section considers existing development needs (space requirements) followed by future development needs.

Existing Needs

Quantitative

- 5.2 Table 5.1 below, provides details of the extent of existing academic accommodation at the University:

Table 5.1 Existing Accommodation

Type of Floorspace	Total Floorspace (GIA)
Academic (Teaching, Research, Support)	125,120sqm
Existing No. of Students(2013)	13,860 FTE
Academic Floorspace Ratio	9.02sqm/student

[Source: Brunel University Estates Strategy 2012:2017]

- 5.3 The University's Estates Strategy 2012-27 confirms that the University's existing academic accommodation extends to approximately 125,120sqm (GIA) which equates to a ratio of around 9.02sqm/student (GIA) (a net ratio of around 7.2 on the basis of an assumed typical gross to net ratio of 1:0.8). This compares to typical higher education institutional net-ratio benchmarks of between 6.48 and 7.78sqm/student (NIA) (Estate Management Statistics prepared by the Higher Education Statistics Agency (2010/11)).
- 5.4 This confirms that in terms of quantum, the existing amount of floorspace appears to be reasonably well aligned with comparable Universities (which indicates that there is not a quantitative need for additional floorspace at this point in time).

Qualitative

- 5.5 The above quantitative assessment masks existing qualitative deficiencies, including:

- Building stock condition – many of the existing buildings are reaching the end of their economic life and require refurbishment/replacement.
- Flood Risk – many of the existing buildings are now located in Flood Zone 3 due to climate change.
- Functionality – Much of the existing accommodation is no longer fit-for-purpose due to changes teaching methods, technology and an increasing requirement for specialist research facilities. This sits alongside an increasingly demanding student market, where quality of accommodation is increasingly important.

5.6 We expand on these existing qualitative needs below:

Existing Building Stock Condition

5.7 The core of the University's campus was constructed in the 1960s/70s. This includes the following buildings:

Antonin Artuad (1967) (2,849sqm)	Joseph Lowe (1968) (991sqm)
Bannerman Centre (1973) (12,040sqm)	Lecture Theatre (9,007sqm)
Biology Annex (1971) (484sqm)	Medical Centre (1967) (365sqm)
Bragg Building (1979) (1,270sqm)	Sewage Pumping Station (1972) (31sqm)
Engineering Stores (1967) (37sqm)	Sports Centre (1972) (5,569sqm)
Flammable Liquids Store (1971) (146sqm)	Engineering Complex (Towers A-D) (1967) (14,580sqm)
Halsbury Building and Plant Room (1971) (8,081sqm)	Wilfred Browne Building (1967) (4,044sqm)
Hamilton Centre (1967) (7,345sqm)	20 Cleveland Road (residential) (1968) (85sqm)
Heinz Wolff (1971) (8,724sqm)	Chepstow Hall (residential) (1969) (4,718sqm)
Howell Building (1968) (4,791sqm)	Clifton Hall (residential) (1969/71) (4,707sqm)
John Crank (1968) (3,822sqm)	Saltash Hall (1966) (4,526sqm)
Total Floorspace: 94,912sqm (GIA)	

5.8 While some piecemeal upgrades have been carried out, most of these buildings are now reaching the end of their life cycle and are in need of major refurbishment works or replacement. This includes the majority of the services infrastructure (pipework, drainage, ventilation, electrical distribution) as well as parts of the building fabric. The majority of these buildings also contain asbestos. The University has identified 16 of the 20 older buildings as "Category C", meaning these are operational but major repair or replacement works are required in the short to medium term. The age and condition of the core 1960s/70s buildings is a constraint on the quality of environment that the University is able to provide, in terms of comfort, service reliability, health and safety, and energy/carbon emissions.

- 5.9 Due to the design and construction of these buildings, it would be not economically viable to refurbish and adapt these to meet modern needs. The most cost effective approach in many cases will be to demolish and rebuild to provide fit-for-purpose high quality accommodation.
- 5.10 For the purposes of this assessment, it is assumed that these buildings will need to be refurbished or replaced on a like-for-like basis as part of a rolling estate renewal programme. Consequently, there is a **need for 94,912sqm of replacement floorspace** (14,036sqm residential and 80,876sqmsqm academic/support floorspace).

Flood Risk

- 5.11 There are a number of existing buildings within the site that now lie within the floodplain of the River Pinn (Flood Zone 3), as a consequence of climate change. This has resulted in events of flooding during times of heavy rainfall.
- 5.12 In many instances the uses of these buildings are not suitable for location in the functional flood plain (having regard to the NPPF Technical Guidance), and this furthermore poses a significant operational risk to the University.
- 5.13 Affected buildings comprise the following:
- Saltash Halls of Residence (4,526sqm GIA);
 - Chepstow Halls of Residence (4,718sqm GIA);
 - Engineering Tower C and D (5,497sqm GIA);
 - Medical Centre (365sqm GIA); and
 - Sports Centre (5,570sqm GIA).
- 5.14 All of the above buildings are identified as requiring replacement/refurbishment on stock condition grounds.
- 5.15 The above buildings extend to approximately 20,676sqm (GIA) (comprising 9,244sqm of student residential accommodation and 11,432sqm of academic and support floorspace).
- 5.16 Assuming like-for-like replacement (bearing in mind that this would be in line with standard benchmarks) this equates to a 'gross' **need for 20,676sqm of replacement floorspace** (on an alternative plot in order to avoid flood risk issues). This need is already accounted for under the stock condition need,

therefore for the purposes of this assessment is netted down to zero to avoid 'double-counting'.

Summary – Existing Needs

- 5.17 In total, in order to meet existing needs, we consider there to be a requirement for land to accommodate approximately **94,912sqm of replacement floorspace (14,036sqm residential and 80,876sqmsqm academic/support floorspace).**

Future Needs

- 5.18 As explained in Section 2, BU is a success story in terms of its role as an education/research institution and as an economic asset and it wishes to capitalise on this via significant growth. This in-house ambition is a response to the wider political, policy and funding/market conditions which are all in place to drive significant growth, as summarised below:

- There is a significant need for economic development in the UK linked to a restructuring of the economy. This is the UK Government's stated principal priority, which is reflected in national planning policy which requires the planning system to do everything it can to support economic development.
- There is specific political and policy support in UK Government for the growth of higher education/research institutions as a consequence of the significant (and increasing) role that they play in economic development. This is particularly applicable to those institutions with STEM subject capabilities (such as Brunel University).
- In order to support this, the Government has made a significant amount of funding available for research activities, matched with market opportunities for spin-offs (both of which are particularly applicable to institutions with a strong research function, such as Brunel). This makes the growth of the University a viable economic proposition (deliverable).
- The University has proven capability in the key target areas of supported growth, matched with ambitions to grow (in terms of its scale and performance).

- 5.19 The University's growth plans (in terms of student numbers) for the next 10 years are set out in the University's Long Term Strategic Plan, as summarised in Table 5.2 below:

Table 5.2 Student Population Projections

Level	Student Population (FTE)	
	2013/14	2022/23
Undergraduate Students	10,124	15,705 (+55%)
Post-graduate Students	2,717	4,215 (+55%)
Post-graduate Research	1,019	1,571 (+54%)
Total	13,860	21,501 (+55%)

Source: Brunel University Long Term Strategic Plan. Note that growth projections beyond 2023 are not available. Refer to Appendix

- 5.20 The projected headcount increases set out in Table 5.2 generate a need for additional teaching (academic), research, and residential accommodation. We set out detail of the assessed needs of each below:

Academic

- 5.21 In order to quantify the amount of additional academic floorspace likely to be required by the above growth projections, we have applied the University's existing per student floorspace ratios in Table 5.3 below (noting that these are consistent with typical higher education institutional benchmarks used for space planning):

Table 5.3 Long Term Academic Accommodation Needs

Increase in Undergraduate and Post-graduate Student Numbers	+7,079
Gross Floorspace Ratio (sqm/student)	9.02 (sqm)
Assessed Need	63,852sqm (GIA)

Research

- 5.22 The accommodation requirements associated with the growth in the University's research activities are difficult to quantify as each research function tends to require bespoke facilities.

- 5.23 Over the past 3 years, the growth of the University's research functions has required new accommodation extending to 3,550sqm. For the purposes of projecting long term development need, we have assumed that this trend will continue (equating to **a floorspace need of 14,200sqm** in the period 2014-2026). Bearing in mind the University's aim of accelerating the growth of its research function, this should be treated as a conservative estimate of need.

Residential (Student Housing)

- 5.24 The University's long term aim is offer sufficient student accommodation in order that the majority of 1st year students (70%) plus a proportion of overseas and postgraduate students are able to take up a place in halls. The number of 1st year students is projected to increase by around 2,000 students (i.e. around one-third of the growth in undergraduate numbers) in the period to 2023. This equates to a need for around 1,400 additional bedspaces. In addition, the University estimates a minimum need for an additional 100 bedspaces to meet the needs of postgraduate/international students. This equates to a total need for around 1,500 bedspaces.
- 5.25 Recent student housing development at the University (Isambard Phase IV) has equated to a floorspace provision of 27sqm per bedspace. Taking this as a benchmark, the requirement for 1,500 additional bedspaces would equate to a **need for around 40,500sqm**.

Summary – Future Needs

- 5.26 On the basis of the above calculations, it is our view that there is a need for an **additional 118,552sqm of floorspace** to meet future needs arising over the next 10 years.

Total Needs

Floorspace Need

- 5.27 Table 5.4 below, sets out the combined total of existing identified needs and projected future needs over the plan period (to 2026):

Table 5.4 Total Assessed Floorspace Needs to 2026

Type of Floorspace	Existing Need (GIA)	Future Need (GIA)	Total Assessed Need (GIA)
Academic	80,876sqm	63,852sqm	144,728sqm
Research	-	14,200sqm	14,000sqm
Student Residential	14,036sqm	40,500sqm	54,536sqm
Total	94,912sqm	118,552sqm	213,264sqm

5.28 There is a residual balance of unimplemented development that remains permitted under the provisions of outline planning consent ref. 532/APP/2002/2237), which is accounted for in Table 5.5 below:

Table 5.5 Residual Floorspace Need to 2026

	Academic Floorspace (GIA)	Research Floorspace (GIA)	Student Residential Floorspace (GIA)
Gross Assessed Need	144,728sqm	14,200sqm	54,536sqm
Balance of Unimplemented Approved Development (committed)	20,546sqm	-	Nil
Residual Need Sub-total	124,182sqm	14,200sqm	54,536sqm
Total	192,918sqm		

5.29 On the basis of Table 5.5, above we conclude that there is a residual need for around **192,918sqm of new development** over the period to 2026.

6. Meeting the Need

Site Selection Criteria

- 6.1 The parameters for site selection are as follows:
- A total site area sufficient to accommodate around 118,682sqm of development.
 - The land must be available for development and either owned by the University or capable of being acquired (within reasonable time and cost constraints).
 - The site must be suitable for the proposed development (in technical and functional terms);
 - The site(s) must be within or adjacent to the existing campus. This is a location-specific need linked to Brunel University's existing Uxbridge campus where disaggregation is not feasible on operational terms. The rationale for this is explained further below:

Location Specific Need

- 6.2 Brunel is a single campus University and wishes to remain as such in order to strengthen its role as a 'campus University in London'. This carries the following competitive advantages:
- The Uxbridge campus represents a cluster of multiple higher education and research activities, all of which benefit from their proximity to one another in terms of operational efficiencies, knowledge sharing/intelligence networks, and added value.
 - The growth of the existing research cluster establishes a greater critical mass of facilities and research capability. This is a key consideration in attracting inward investment, research funding bids, and post-graduate students/staff.
 - The scale considerations outlined above help to drive teaching quality and education attainment.
 - A single campus university is a key selling point for prospective undergraduate students, particularly those from overseas.

Opportunity Cost

- 6.3 As explained above, the provision of the University's growth on-site will allow it to compete and perform more effectively than would otherwise be the case. If the University is not allowed to grow/expand, the opportunity cost to the local, regional and national economy will be significant.
- 6.4 The development needs of the University should be considered in the context of wider development needs and land supply in the borough and London as a whole, with a balanced judgement taken to how the limited supply of suitable land can be best used (noting that the take-up of development land elsewhere within the borough/London will reduce the reservoir of development land for other uses).

Potential Sites

- 6.5 On the basis of the above site search parameters, the need can be best met on Sites 1-5. We consider the potential of each below:

Sites 1 and 2 (Previously Developed Land)

- 6.6 There is a need for 94,912sqm of new/refurbished floorspace to replace existing accommodation. It is assumed that Sites 1 and 2 have capacity to support **74,236sqm** of this need via the 1:1 replacement (or refurbishment) or existing floorspace on the same plot (the remainder of the existing floorspace is located on land subject to flooding and is therefore not suitable for reuse).
- 6.7 The 2004 Masterplan scheme sought to optimise the development capacity of Sites 1 and 2 in order to avoid encroaching on land designated as Green Belt that is not previously developed. The University intends to implement the residual balance of consented development within the next 5 years. This residual balance of approved development has been accounted for in the need calculations in the previous section. The approved Parameters Plan, which is enclosed at Appendix B, identifies the location of existing retained buildings and the proposed new development zones. As is clear from the plan, once fully implemented there will be limited remaining land with potential to support infill development.

6.8 While limited, there remains some potential for intensification via infill development that the University is keen to fully exploit. Further to this, the University considers there to be some potential for selective demolitions and replacement with more intensive development (including the decking of surface car parking areas for example). In order to estimate this potential, a capacity assessment of the previously-developed parts of sites 1 and 2 has been undertaken (May 2014).

Methodology

6.9 The campus was broken down into defined 'plots' identified from the current layout and the approved Masterplan. Each plot has been reviewed in terms of its area, existing use(s), access, location and adjacent uses and built form. Potential to support intensification has then been assessed on the basis of suitability, availability, viability. Each plot has been classified as having 'high', 'medium' or 'low/nil' potential.

6.10 The outcomes of the assessment are set out at Appendix F, and summarised below:

Table 6.1 Site Capacity Assessment

	Net Site Area	Gross Capacity	Net Discounted Capacity	Replacement Floorspace Need Generated by Demolitions	Net Capacity
Nil Potential (non-qualifying sites)	24.91ha	-	-	-	-
Medium Potential	0.74ha	6,660sqm	3,330qm	-3,732sqm (discounted to 1,866sqm)	1,464sqm
High Potential	3.47ha	31,230sqm	31,230sqm	-2,821sqm	28,409sqm
Total	29.12ha	37,890sqm	34,560sqm	4,687sqm	29,873sqm

6.11 On the basis of the assessment, we estimate that the previously developed parts of Sites 1 and 2 have the **capacity to accommodate around 29,873sqm of net additional development** through intensification. This would require testing via detailed design work in due course.

6.12 This is in addition to the 1:1 on-plot replacement of 74,236sqm of existing accommodation. In total this indicates that **Sites 1 and 2 have capacity to support 104,109sqm of development.**

6.13 We note that all of Sites 1 and 2 (including the previously developed areas) are designated as Green Belt. On the basis that they are already intensely developed, for the purposes of this assessment we assume that intensification will not give rise to any significant material harm on the openness of the Green Belt and therefore would be acceptable in principle in Green Belt policy terms.

Sites 3 and 5

6.14 Both of these sites are currently used as sport pitches. These are essential facilities for the University, the loss of which would be to the detriment of the University's sports facilities, which are also used by local schools and the community. Consequently this land is not available for development and therefore is not capable of meeting the need.

Site 4

6.15 Site 4 extends to approximately 12.4ha. The site comprises 2 distinct areas:

- Unused land formerly used as a market garden; and
- Garden centre site.

Former Market Garden

6.16 The former market garden site extends to approximately 10.8ha and previously accommodated extensive fixed surface infrastructure and associated structures. Much of the surface infrastructure remains visible.

6.17 It is largely unused, can be made available for development (in full), and is considered suitable for development (with the exception of those parts of the site within the floodplain which are presumed to be unsuitable for new buildings). However, the site's suitability in planning terms is significantly constrained by its designation as Green Belt and it does not meet the statutory definition of previously developed land.

- 6.18 In considering the principle of developing this land, it is necessary to consider the harm that development might have in terms of Green Belt objectives.
- 6.19 The NPPF confirms the five purposes of Green Belt land to be the following:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.20 The aerial photograph enclosed at Appendix D illustrates that Site 4 is located within a predominantly built up area – the site (and adjacent land) is entirely encircled by built development. Considering the objectives for Green Belt land above, this land does not serve to control urban sprawl or to prevent neighbouring towns from coalescing; it does not perform a function of safeguarding the countryside from encroachment; it does not preserve the setting/character of a historic town; and there is no obvious way in which it assists in urban regeneration. Given this, it is robust to conclude that this site does not perform a Green Belt function. Its loss, therefore, would not be capable of having a significant detrimental impact on the functioning of the wider Green Belt in Hillingdon.
- 6.21 Addressing LBH's Local Plan suggestion that Hillingdon's Green Belt land serves to maintain a distinction between urban and rural land and to control development in the open countryside, it is important to note that Site 4 is neither within the open countryside nor within a rural environment. It is comprises a pocket of undeveloped land (to which the public has no access) that is encircled by built development.
- 6.22 On the basis of the above, we consider that the site does not make a meaningful contribution towards Green Belt objectives and therefore it is neither necessary nor appropriate to keep this land permanently open. It is on this basis that we consider this site to be suitable for development in principle.
- 6.23 On the basis of an estimated net developable area of around 8ha (reduced from 10.8ha to account for the flood plain) and comparable existing development densities on Sites 1 and 2, we consider this site to have **capacity**
-

to accommodate around 72,000sqm of development. This would need to be tested via detailed design and technical work in due course to include a comprehensive landscape/visual impact assessment and masterplanning process.

Garden Centre Site

- 6.24 The garden centre site is owned by the University but leased to a garden centre operator. It is in active use and not currently available for development, however this position may change in the future.
- 6.25 It is remote from the University's main campus which constrains its development suitability on accessibility grounds. However, this will be overcome if the remainder of Site 4 (market garden site) is brought forward for development.
- 6.26 The site is designated as Green Belt, however (in accordance with the assumptions applied to Sites 1 and 2), on the basis that they are already intensely developed, for the purposes of this assessment we assume that intensification will not give rise to any significant material harm on the openness of the Green Belt and therefore would be acceptable in principle in Green Belt policy terms.
- 6.27 On the basis of a net developable area of 1.6ha and comparable existing development densities on Sites 1 and 2, we consider this site to have capacity **to accommodate around 14,400sqm of development.**

Site 1 (Land not Previously Developed)

- 6.28 Site 1 accommodates an area of greenfield land to the north and west of the Isambard student housing complex, extending to approximately 4.9ha. It is our view that the principles set out above in respect to the undeveloped parts of Site 4 also apply to this land and therefore we consider this land to be suitable for development. On the basis of the above plot ratio assumptions, we estimate that this land has the **capacity to accommodate around 54,444sqm of development.**

3rd Party Land Surrounding the University

6.29 We have investigated the potential of 3rd party land adjacent to the University to meet the identified needs. Our investigations indicate that such land is neither currently available for development nor suitable for the development required, without a comprehensive land assembly process which would likely render the University's growth plans unviable/undeliverable.

Summary of Identified Capacity

6.30 Table 6.2, below, summarises the assessed capacity:

Table 6.2 Summary of Assessed Capacity

Site	Estimated Capacity
Sites 1 and 2 (previously developed)	104,109sqm
Site 1 (not previously developed)	54,444sqm
Sites 3 and 5	-
Site 4 (market garden)	72,000sqm
Site 4 (garden centre site)	14,400sqm
3rd Party Surrounding Land	-
Total	244,953sqm

Conclusion

6.31 On the basis of the above analysis, we conclude that the assessed needs of the University can be best met via the following:

- Intensification/infilling of Sites 1 and 2 (previously developed and non-previously developed land)
- Development of Site 4 (market garden and garden centre sites).

Wider Development Management Considerations

- Transport – For the purposes of this assessment of need, it is assumed that suitable vehicle access arrangements to the above sites can be achieved. It is further assumed that highway infrastructure capacity issues

can be dealt with via measures to suppress trip generation rates and the encouragement of sustainable transport modes, supported by upgrade/mitigation works where necessary. The same principle applies to all infrastructure.

- Landscape/Urban Design – A masterplan will need to be draw up in due course to underpin development proposals across the campus as a whole (Sites 1-5), which should seek to minimise adverse effects on the openness of the wider green belt and ensure the highest standards of urban design. We would expect the future masterplan to test in more detail the capacity of the previously developed parts of Sites 1 and 2 (which should be treated as the sequentially preferable location for development).
- Environmental/Technical Matters – We assume that Sites 1, 2 and 4 are subject to numerous unknown environmental/technical constraints which will influence the extent and form of development supportable. Nonetheless, for the purpose of this assessment we assume that such constraints will not preclude development. Survey work will need to be undertaken in due course to confirm this position.

7. Recommended Policy Response

- 7.1 The NPPF advocates a plan-led approach, underpinned by the presumption in favour of sustainable development. For plan-making this means that:
- Local planning authorities should positively seek opportunities to meet the development needs of their area; and
 - Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless:
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
 - Specific policies in this Framework indicate development should be restricted.
- 7.2 The key policy issue here is balancing the conflicting objectives of positively planning to meet development needs in full versus protective policies associated with the Green Belt designation that affects the site.
- 7.3 The NPPF allows for Planning Authorities to revise Green Belt boundaries as part of the Local Plan reviews. Reviews must be justified by 'exceptional circumstances'. It is our view that exceptional circumstances exist in this instance to justify the release of Sites 1,2 and 4 from the Green Belt on the following grounds:
- There is an objectively assessed need for economic/education development;
 - This is a locational specific need – there are no suitable or available alternative (non-Green Belt) sites capable of meeting the need
 - The loss of sites 1, 2 and 4 from the Green Belt would unlikely to be capable of having a significant adverse impact on Green Belt objectives (and therefore would carry limited/nil harm in Green Belt terms).
- 7.4 In order to plan positively to meet the identified need, we recommend putting in place a site-specific policy covering the entire Brunel University campus (Sites 1-5) which should specifically confirm the principle of development on Sites 1, 2 and 4, to include the revision of the Green Belt designation boundary to exclude Sites 1, 2 and 4.
-

8. Benefits

- 8.1 As discussed in the previous section, if the University's assessed development needs are to be met, it requires significant development on Sites 1, 2 and 4, much of which is currently open land designated as Green Belt.
- 8.2 In accordance with NPPF paragraph 14, the Local Planning Authority should take a balanced approach in considering the acceptability of this in planning terms. Following this guidance requires the emerging Local Plan to meet the needs (i.e. support development in principle) unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 8.3 It is acknowledged that any development on the undeveloped parts of Sites 1 and 4 will inevitably have an adverse impact on the openness of the Green Belt, albeit this would be a localised impact on land which we do not consider to make a meaningful contribution towards Green Belt objectives.
- 8.4 This limited harm (in policy terms) should be considered in the context of the following benefits (which we consider to be of national significance) that would result from the growth of the University as a higher education provider and research institution:
- Generation of an estimated 1,300 jobs (calculated on the basis of a proportional growth of jobs in line with increase in student numbers);
 - Increase in higher education student places of around 7,000, which would extend education opportunities at a local/regional/national level and directly contribute to improved UK and local economic performance via a more highly and appropriately skilled population. The planned greater focus and growth of STEM subject teaching and research will add further value (in terms of its alignment with UK economic strategy);
 - An increase in the number of overseas students will increase the value of UK service exports;
 - The University will be better able to compete for significant Government funding to support research, which would draw significant investment into Hillingdon that would otherwise go elsewhere. This research work would create significant spin-off opportunities, directly contributing to longer term local/regional/national economic success;

- Increase the annual turnover of the University by around £90m per annum (calculated on a pro-rata basis of the existing), which would generate an estimated additional £124m of turnover in the wider economy as a consequence of multiplier effects;
- Improved profile for London Borough of Hillingdon, London and the UK in terms of its education services and key economic assets;
- Indirect benefits to the local community in terms of outreach programmes and potential for use of facilities;
- Releasing other land on Sites 1 and 4 for development will increase the amount of undeveloped land on Site 2 (a 'swap' position) which will increase its 'openness'. This relates to land that is in the flood plain which currently accommodates buildings and which will not be re-built on.
- Broader environmental benefits, including the amenity of the River Pinn which would be greatly improved by the demolition of buildings on Site 2 and via the restoration of the river on Site 4 (the approach would be to naturalise the channel of the river and increase flood storage opportunities).

9. Conclusions

9.1 We consider that the emerging Hillingdon Local Plan (Part 2) should include site specific policy support for the development of academic, research and student residential floorspace on land at Brunel University (Sites 1,2 and 4).

9.2 We consider Site 4 at Brunel University to be suitable for development, on the following grounds:

- UK higher education institutions play an increasingly important role in supporting economic growth and the shift towards a more balanced economy. The Government recognises that the function of universities has moved beyond education, expanding into research and development which are seen as key drivers of innovation and UK economic performance which the Government is eager to support.
- Brunel University is a demonstrably successful and improving higher education and research institution, as confirmed by its league table positions. It also plays a significant role in the local economy by employing 2,450 staff and contributing an estimated £445m to the economy every year.
- The University wishes to capitalise on this success (as an education, research, and economic asset) and is preparing for growth. It intends to increase student numbers by up to 50% over the next 10 years alongside structural/operational changes to align its higher education and research offer more closely with the target areas for growth set out in the Government's economic strategy for the UK (focussing on STEM subjects). This planned growth is dependent on the development of new and improved academic and student residential accommodation at the University.
- National and regional planning policies require the emerging Hillingdon Local Plan to support the growth of the University and, more specifically, include policies that plan positively to meet the University's development needs in full.
- The University's development needs have been assessed in an objective manner having regard to both quantitative and qualitative considerations. This assessment has concluded that there is a need for around 192,918sqm of new development over the next 10 years (over

and above the residual balance allowed under the extant outline consent ref. 532/APP/2002/2237).

- The potential of a number of alternative sites to accommodate this need has been tested (following set criteria). This has concluded that part of this requirement could be met on Sites 1 and 2, however the majority can only feasibly be accommodated on Site 4 (land to the south of the main University built-up campus).
- The entire campus is designated as Green Belt where there is a general presumption against inappropriate development. However, the principle of development on the built-up areas of Sites 1, 2, and 4 has already been established.
- The principle of development on the undeveloped parts of Sites 1 and 4 is not yet established in planning terms. It is our view that this land does not make a meaningful contribution towards Green Belt objectives and therefore carries limited value in Green Belt terms. As a consequence, it is our view that it is neither necessary nor appropriate to keep this land open. This is in the context of the very exceptional circumstances associated with the demonstrable need for development outlined in this paper.
- Allowing development on the undeveloped parts of Sites 1 and 4 would realise a host of socio-economic benefits of national significance which would outweigh the limited harm that development would have on the Green Belt.

Appendix A

Site Plan

Appendix B

Parameter Plan (2004 Outline Consent)

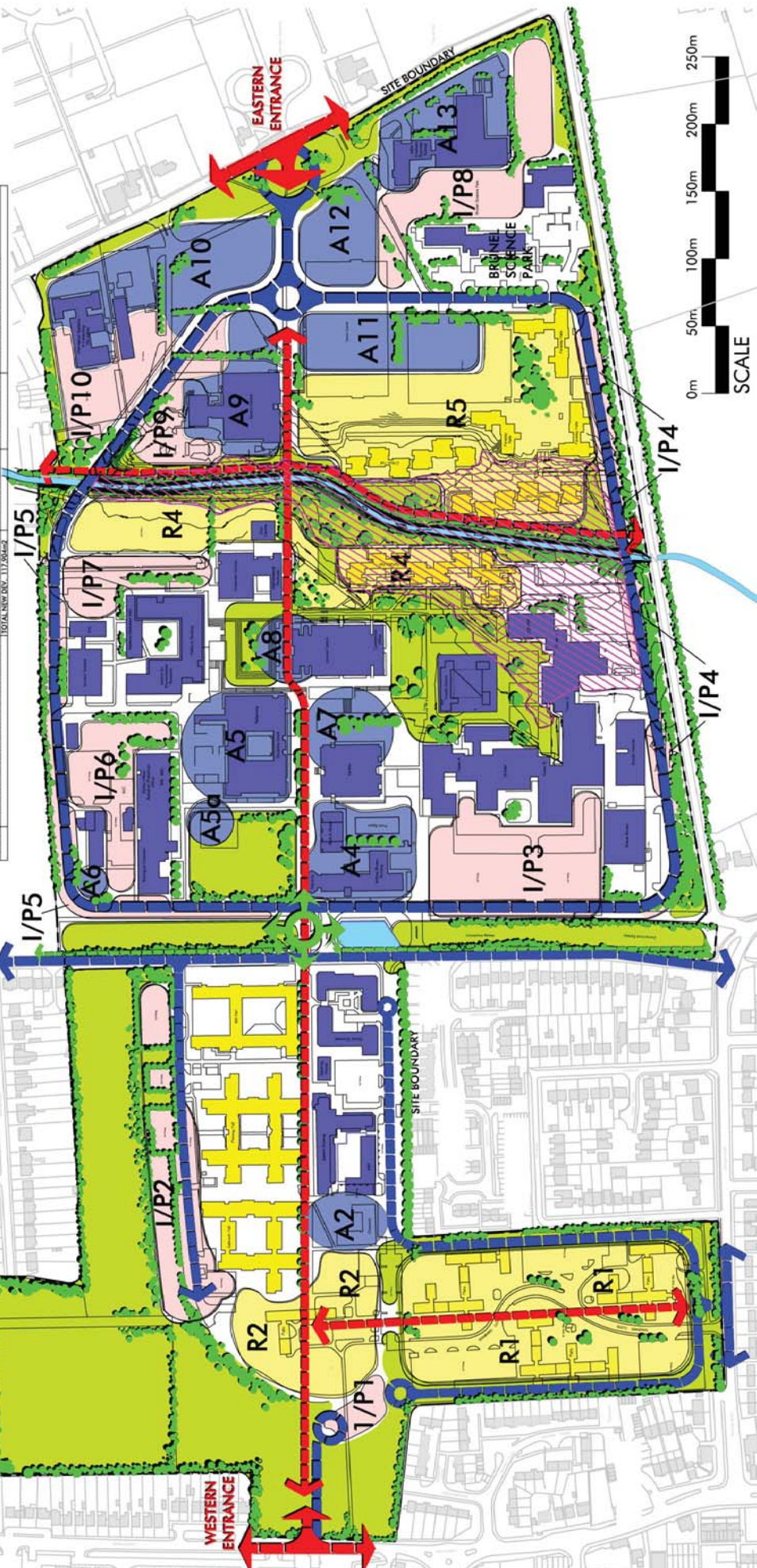
K E Y

- A1** NEW ACADEMIC DEVELOPMENT ZONES
- R1** NEW STUDENT RESIDENTIAL DEVELOPMENT ZONES
- I/P1** LANDSCAPING ZONES
- A1** INFRASTRUCTURE/PARKING AREAS
- PRINCIPAL PEDESTRIAN ROUTES**
- VEHICLE ACCESS**
- TRAVEL PLAN CENTRAL CIRCULATION HUB**
- EXISTING ACADEMIC BUILDINGS**
- EXISTING STUDENT RESIDENTIAL BUILDINGS**
- EXISTING LANDSCAPE AREAS**
- 1 in 100Y RETURN PERIOD FLOOD LEVEL**
No new buildings to be constructed within flood boundary



At present the Brunel Campus has 1,942 No. parking spaces on sites 1&2. The total number of spaces is to increase to 2,598.

ZONE	AREA OF NEW DEVELOPMENT	No. OF STOREYS	No. of Buildings	TYPE OF DEVELOPMENT
R1	New Student Residential Accommodation	3 Storeys	6,630/100	New build / Replacement of existing blocks
R2	New Student Residential Accommodation	3 Storeys	2,500	New build
R3	New Student Residential Accommodation	3 Storeys	7,870/100	New build and extension of existing blocks
R4	New Student Residential Accommodation	3 Storeys	17,500/100	New build and extension of existing blocks
R5	New Student Residential Accommodation	3 Storeys	10,741,67,840/100	New build and extension of existing blocks
R6	New Student Residential Accommodation	3 Storeys	22,492	22,492 New build units and 650 replacement units
A1	New Academic Building	5	1	New build
A2	New Academic Building	5	1	New build
A3	New Academic Building	5	1	Extension/Refurbishment
A4	New Academic Building	5	1	Extension/Refurbishment
A5	New Academic Building	5	1	Extension/Refurbishment
A6	New Academic Building	5	1	Extension/Refurbishment
A7	New Academic Building	5	1	Extension/Refurbishment
A8	New Academic Building	5	1	Extension/Refurbishment
A9	New Academic Building	5	1	Extension/Refurbishment
A10	New Academic Building	5	1	Extension/Refurbishment
A11	New Academic Building	5	1	Extension/Refurbishment
A12	New Academic Building	5	1	Extension/Refurbishment
A13	New Academic Building	5	1	Extension/Refurbishment
I/P1	Infrastructure/Parking	2	2	New build
I/P2	Infrastructure/Parking	2	2	New build
I/P3	Infrastructure/Parking	2	2	New build
I/P4	Infrastructure/Parking	2	2	New build
I/P5	Infrastructure/Parking	2	2	New build
I/P6	Infrastructure/Parking	2	2	New build
I/P7	Infrastructure/Parking	2	2	New build
I/P8	Infrastructure/Parking	2	2	New build
I/P9	Infrastructure/Parking	2	2	New build
I/P10	Infrastructure/Parking	2	2	New build
R1	Residential	3	1	Extension/Refurbishment
R2	Residential	3	1	Extension/Refurbishment
R3	Residential	3	1	Extension/Refurbishment
R4	Residential	3	1	Extension/Refurbishment
R5	Residential	3	1	Extension/Refurbishment
R6	Residential	3	1	Extension/Refurbishment
R7	Residential	3	1	Extension/Refurbishment
R8	Residential	3	1	Extension/Refurbishment
R9	Residential	3	1	Extension/Refurbishment
R10	Residential	3	1	Extension/Refurbishment
R11	Residential	3	1	Extension/Refurbishment
R12	Residential	3	1	Extension/Refurbishment
R13	Residential	3	1	Extension/Refurbishment
R14	Residential	3	1	Extension/Refurbishment
R15	Residential	3	1	Extension/Refurbishment
R16	Residential	3	1	Extension/Refurbishment
R17	Residential	3	1	Extension/Refurbishment
R18	Residential	3	1	Extension/Refurbishment
R19	Residential	3	1	Extension/Refurbishment
R20	Residential	3	1	Extension/Refurbishment
R21	Residential	3	1	Extension/Refurbishment
R22	Residential	3	1	Extension/Refurbishment
R23	Residential	3	1	Extension/Refurbishment
R24	Residential	3	1	Extension/Refurbishment
R25	Residential	3	1	Extension/Refurbishment
R26	Residential	3	1	Extension/Refurbishment
R27	Residential	3	1	Extension/Refurbishment
R28	Residential	3	1	Extension/Refurbishment
R29	Residential	3	1	Extension/Refurbishment
R30	Residential	3	1	Extension/Refurbishment
R31	Residential	3	1	Extension/Refurbishment
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R33	Residential	3	1	Extension/Refurbishment
R34	Residential	3	1	Extension/Refurbishment
R35	Residential	3	1	Extension/Refurbishment
R36	Residential	3	1	Extension/Refurbishment
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R38	Residential	3	1	Extension/Refurbishment
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R86	Residential	3	1	Extension/Refurbishment
R87	Residential	3	1	Extension/Refurbishment
R88	Residential	3	1	Extension/Refurbishment
R89	Residential	3	1	Extension/Refurbishment
R90	Residential	3	1	Extension/Refurbishment
R91	Residential	3	1	Extension/Refurbishment
R92	Residential	3	1	Extension/Refurbishment
R93	Residential	3	1	Extension/Refurbishment
R94	Residential	3	1	Extension/Refurbishment
R95	Residential	3	1	Extension/Refurbishment
R96	Residential	3	1	Extension/Refurbishment
R97	Residential	3	1	Extension/Refurbishment
R98	Residential	3	1	Extension/Refurbishment
R99	Residential	3	1	Extension/Refurbishment
R100	Residential	3	1	Extension/Refurbishment



**BRUNEL UNIVERSITY
PARAMETERS PLAN**

The Fairhursts Design Group
Bank Chambers
Faulkner Street
Manchester M1 4EH

DRAWN	CHECKED	REVISION	DATED
DLW	EPF	M	07/07/03

Fairhursts
ARCHITECTS

Job No: S1463
Scale: 1:1500@A1
Date: 07/07/03

01-09

BRUNEL UNIVERSITY

Appendix C

2004 Outline Consent Reconciliation Table and Plan



Brunel University Masterplan (Outline Planning Permission ref. 532/APP/2002/2237)

Reconciliation Table

Student Accommodation

Zone	Use	Approved Under Outline Consent	Reserved Matters Approved	Ref	Implemented
R1	Student residential accommodation	20,700	✓	532/APP/2006/2339	✓
R2	Student residential accommodation	12,500			
R4	Student residential accommodation	17,500	✓	532/APP/2005/308	✓
R5	Student residential accommodation	19,140	✓	532/APP/2004/2258	✓
Sub-total (Student residential accommodation)		69,840	69,840	-	69,840

Academic Floorspace

Zone	Use	Approved Under Outline Consent	Reserved Matters Approved	Ref	Implemented	Remaining Balance (Future Reserved Matters Applications)
A2	Academic floorspace	4,300	-	-	-	4,300
A4	Academic floorspace	5,000	✓	532/APP/2005/3534	✓	-
A5 + A5a	Academic floorspace	6,950	✓	532/APP/2004/1054	1,600	5,350
A6	Academic floorspace	200	-	-	-	200
A7	Academic floorspace	5,000	✓	532/APP/2002/2236	✓	-
A8	Academic floorspace	250	✓	532/APP/2006/251	50	200
A9	Academic floorspace	3,000	✓	532/APP/2003/1890	1,000	2,000*
A10	Academic floorspace	12,100	✓	532/APP/2009/566	7,165	4,935
A11	Academic floorspace	5,264	✓	532/APP/2003/1890	3,203	2,061*
A12	Academic floorspace	4,500	✓	532/APP/2004/2092	✓	-
A13	Academic floorspace	1,500	-	-	-	1,500
Sub-total (academic floorspace)		48,064	42,064	-	27,518	20,546

* Condition 20 attached to permission ref: 532/APP/2002/2237 states that the combined floorspace of buildings A9 and A11, approved under permission ref: 532/APP/2003/1890 must not exceed 11,162m², including floorspace that already existed prior to the 2003 permission. To date, approximately 8,000m² has been constructed and 3,162m² of the consented 4,061m² is still to be developed.

GVA

16th March 2012

REFERENCE DOCUMENTS

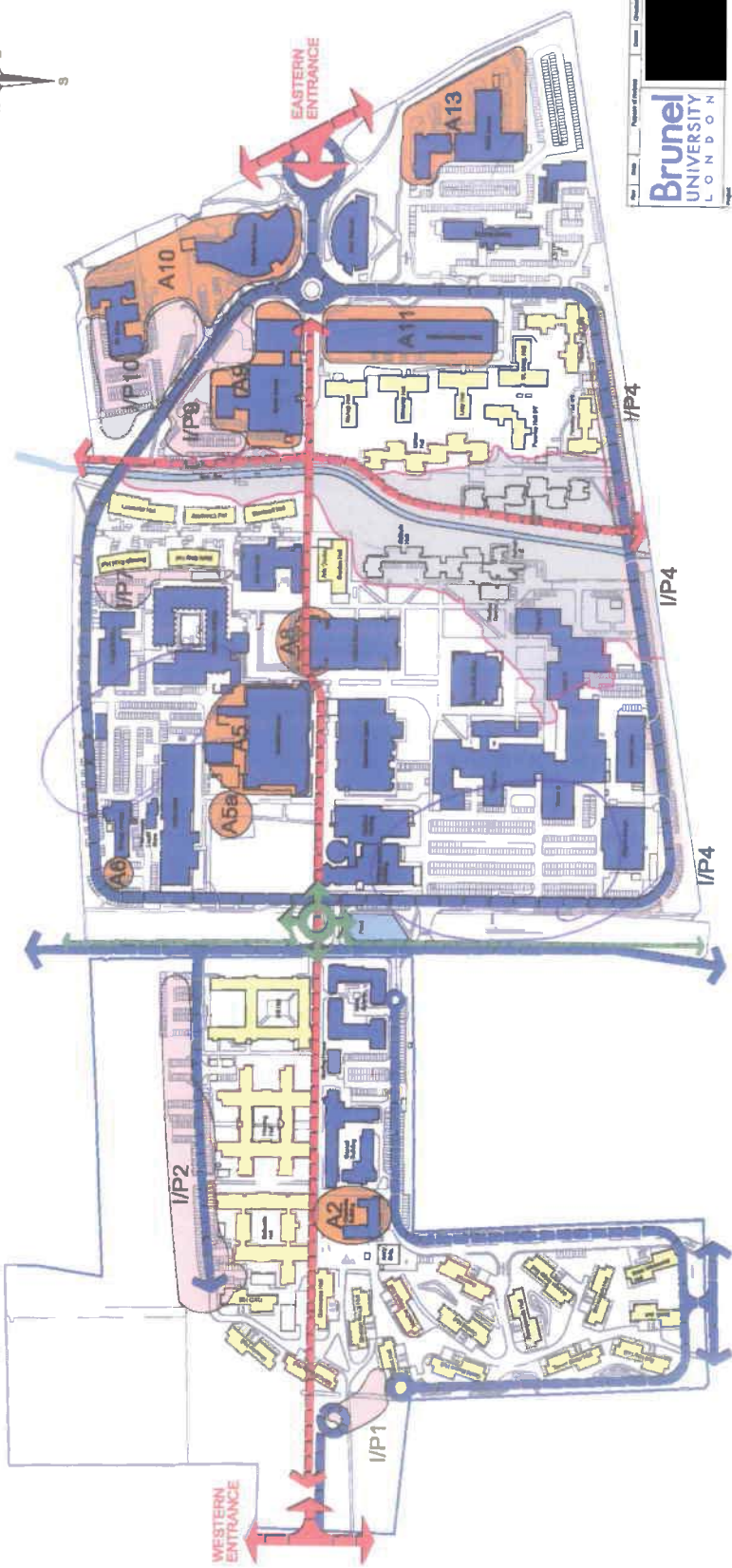
- ONA MASTERPLAN RECONCILIATION TABLE
- B1-08 PARAMETERS PLAN REV A

KEY

- EXISTING ACADEMIC BUILDINGS
- EXISTING STUDENT RESIDENTIAL BUILDINGS
- 1 IN 100 YEAR RETURN PERIOD FLOOD LEVEL
- MASTERPLAN 2004 OUTSTANDING ACADEMIC DEVELOPMENT ZONES
- MASTERPLAN 2004 INFRASTRUCTURE AREAS

Notes:

1. The masterplan is a guide to the development and should not be used as a definitive plan.
2. The masterplan is subject to change and should be used as a guide only.
3. The masterplan is subject to change and should be used as a guide only.
4. Discrepancies shown on this drawing shall not be used. City Centre or University Centre shall apply.



Brunel UNIVERSITY LONDON

BRUNEL UNIVERSITY ESTATE

SITES 1 & 2
PARAMETERS PLAN
REMAINING MASTERPLAN DEVELOPMENT ZONES

FOR INFORMATION

Project No.	1000000000
Client	Brunel University
Scale	1:1000
Date	15.03.18
Author	...
Check	...
Drawn	...
Discipline	...

BRUNEL UNIVERSITY
OF ACADEMIC DEVELOPMENT AND INFRASTRUCTURE
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Appendix D

Aerial Photograph



Appendix E

Student number Projections

Student number Projections

	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Level 1 (including foundation and LIBT)	3,621	3,802	3,992	4,192	4,401	4,621	4,852	5,095	5,350	5,617
Level 2	3,394	3,564	3,742	3,929	4,125	4,332	4,548	4,776	5,014	5,265
Level 3 (including MEng)	3,109	3,264	3,428	3,599	3,779	3,779	4,166	4,375	4,593	4,823
Level 5 – PGT (including PG-CERT)	2,717	2,853	2,995	3,145	3,303	3,303	3,641	3,823	4,014	4,215
Level 6 – PGR)	1,019	1,070	1,123	1,180	1,239	1,239	1,366	1,434	1,506	1,581
Total	13,860	14,553	15,281	16,045	16,847	16,847	18,574	19,502	20,478	21,501

Appendix F
Site Capacity Assessment

Brunel University: Sites 1 and 2 Capacity Assessment

Assessment Rules/Assumptions

1. Qualifying Criteria

The campus was broken down into a series of zones which were each assessed against suitability, availability and viability criteria in order to determine their potential for redevelopment.

Suitability

- All sites are previously developed and therefore suitable for development in principle, subject to the following exceptions
 - o Sites within the floodplain are considered unsuitable
 - o Sites accommodating statutorily listed buildings are considered unsuitable
 - o Sites accommodating locally listed buildings are considered 'potentially-suitable'
- All sites will be subject to technical and environmental constraints, however none that will be insurmountable.

Availability

- Vacant sites (land not accommodating buildings) assumed to be available
- Sites accommodating existing buildings accounted for as requiring replacement in Section 5 of need assessment (see para 5.7) are classed as not available in order to avoid double-counted. Existing floorspace need is assumed to be replaced via refurbishment or redevelopment on a 1:1 basis on the same plot.
- All other sites can be made available for development (potentially available) (assumed that existing floorspace/infrastructure will require replacing as part of redevelopment solution)
- Sites subject to the 2004 OPP where development has not yet been implemented considered to be not available for development – it is assumed that the approved development is to be implemented (to avoid double-counting)

Viability

- Redevelopment of sites accommodating a Category A building is assumed to be not viable (as the value/replacement cost of the existing building will be too high) (unless stated as an exception)
- Redevelopment of sites where development has been implemented pursuant to the 2004 OPP is assumed to be not viable (as the value/replacement cost of the existing building will be too high) (unless stated as an exception), with the exception of car parking areas.
- Redevelopment of sites accommodating Category B buildings assumed to be a potentially-viable proposition if there is scope for significant intensification (double/triple existing density) (value of development solution required to 'absorb' replacement cost of existing)
- Redevelopment of sites accommodating Category C buildings assumed to be viable (as the existing building carries limited value)
 - o if existing buildings have reached the end of their economic lives (Category C) (i.e. they have no value/replacement cost)
 - o if there is potential for significant intensification (double/triple density).

Assessing the potential for intensification

- In order to 'qualify' as having potential for redevelopment, sites had to score 'yes' or 'potentially' for each of the 3 criteria.
- Sites were categorised as having 'high', 'medium', or 'nil' potential.
- The potential capacity of each site was estimated via the application of an assumed realisable plot ratio of 0.90 (see note on plot ratios below), which calculated a gross development capacity
- It is assumed that existing floorspace would need to be replaced on a like-for-like basis where demolition is necessary to make way for new development. Accordingly, the gross estimated capacity has been netted off by subtracting existing floorspace (demolitions) (which is discounted in line with the net capacity discounting explained below)
- The net capacity of plots with 'medium' potential was discounted by 50% to account for assumed deliverability issues. Sites with 'high' potential were not subject to discounting.
- The result is the net assumed discounted capacity of the site to accommodate new development.

Notes – Plot Ratios

- The existing development on Plots 1 and 2 extends to approximately 233,851sqm across a gross site area of approximately 40ha. This equates to a gross plot ratio of around 0.58. (a net plot ratio of approximately 0.81)
- Development approved under the outline consent extended to 117,904sqm which is being/has been implemented on a net site area of approximately 13.05ha. This equates to a net plot ratio of around 0.90.

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
1	Isambard Complex	Existing Use: Student Accommodation Approximate Age: 2008 Storeys: Part 4/5 Plot area (approx.): 4ha Existing Floorspace: 35,375sqm Existing Building Condition: Category A Covered by 2004 Masterplan: Yes. Plots R1 and R2. Approved development implemented.	Modern redeveloped plot for student accommodation completed in 2008. The accommodation provides a total of 1,118 en suite rooms and 112 studio flats for couples across 17 blocks, part 4/5 storeys in height. There is also a separate 2 storey plant compound. The plot is intensively covered by the existing buildings, with the remainder covered by landscaping; limited areas of parking which are predominantly for disabled users located adjacent to the blocks; and internal roads providing access for service and emergency vehicles. The plot is bound by open space within the university's ownership (Site 1) to the north and west, Station Road to the south, and 2 storey residential properties on The Ave and Ratcliffe Close to the east.	Suitable: Yes Available: Potentially Viable: No – developed pursuant to 2004 consent	Nil
	Galbraith Hall	Existing Use: Student Accommodation Approximate Age: 1990s Storeys: Part 3/4 Plot area (approx.): 0.58ha Existing Floorspace: Existing Building Condition: Category B Covered by 2004 Masterplan: No	Developed in the 1990s for student accommodation. The accommodation provides 328 rooms within one building comprising five wings, part 3/4 storeys in height. The plot is intensively covered with accommodation set around central landscaped courtyard. The remainder of the plot is covered by a small area of car parking and landscaping. The plot is bound by central path to the south, car park to the north and adjacent 3/4 and 4/5 storey student accommodation to the east and west respectively.	Suitable: Yes Available: Potentially Viable: No – Building category B and reasonably dense development	Nil
	Fleming Hall	Existing Use: Student Accommodation Approximate Age: 1990s Storeys: Part 3/4 Plot area (approx.): 0.80ha Existing Floorspace: 9,803sqm Existing Building Condition: Category B Covered by 2004 Masterplan: No	Developed in the 1990s for student accommodation. The accommodation provides 380 rooms within one building comprising a '# ' shape, part 3/4 storeys in height. The plot is intensively covered with accommodation set around central landscaped courtyard. The remainder of the plot is covered by landscaping which separates the adjacent plots. The plot is bound by car park to the north, 3 storey Gaskell academic building to the south and adjacent 4 and 3/4 storey student accommodation to the east and west. Soft landscaping separates the adjacent student accommodation.	Suitable: Yes Available: Potentially Viable: No – Building category B and reasonably dense development	Nil
	Mill Hall	Existing Use: Student Accommodation Approximate Age: 1990s Storeys: 4 (plant above) Plot area (approx.): 0.65ha Existing Floorspace: 8,034sqm Existing Building Condition: Category B Covered by 2004 Masterplan: No	Developed in the 1990s for student accommodation. The accommodation provides 357 rooms within one building comprising four wings and 4 storeys in height (4th storey accommodation in the roof) with plant above. The plot is intensively covered, with the wings intersecting to create two landscaped courtyards. A separate landscaped strip to the east provides separation distance with Cleveland Road. The plot is bound by car park to the north, the 2 storey Marie Jahoda academic building to the south, adjacent 3/4 storey student accommodation to the west and Cleveland Road to the east. Soft landscaping to west, east and part north, separating Fleming Hall, Cleveland Road and car park respectively.	Suitable: Yes Available: Potentially Viable: No – Building category B and reasonably dense development	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Chadwick	<p>Existing Use: Academic Building</p> <p>Approximate Age: 1960s/70s</p> <p>Storeys: 2</p> <p>Plot area (approx.): 0.17ha</p> <p>Existing Floorspace: 1,005sqm</p> <p>Existing Building Condition: Category C</p> <p>Covered by 2004 Masterplan: Yes. Plot A2. Approved development not implemented.</p>	<p>Temporary prefabricated two-storey building and temporary single storey port-a-cabin toilet covering approximately 50% of plot with soft landscaping on the remainder of the plot to the north.</p> <p>The plot is bound by 3/4 storey student accommodation to the north, West Spur Road to the south, 3 storey Gaskell building to the east and 3 storey Social and Amenity building to the west. Two storey residential terrace properties are located off-campus further south of West Spur Road.</p>	<p>Suitable: Yes</p> <p>Available: No (covered by 2004 OPP)</p> <p>Viable: Yes</p>	Nil
	Gaskell	<p>Existing Use: Academic Building</p> <p>Approximate Age: 1990s</p> <p>Storeys: 3 (plant above)</p> <p>Plot area (approx.): 0.4ha</p> <p>Existing Floorspace: 4,797sqm</p> <p>Existing Building Condition: Category B.</p> <p>Covered by 2004 Masterplan: No</p>	<p>Developed in the 1990s for academic use and is occupied by the School of Arts. The plot has been intensively developed and comprises a modern 3 storey red brick building with plant above and central courtyard and small area of car park to the south, access from West Spur Road.</p> <p>The plot is bound by 3/4 storey student accommodation to the north, West Spur Road to the south, car park to the east and temporary 2 storey Chadwick building to the west. Two storey residential terrace properties are located off-campus further south of West Spur Road.</p>	<p>Suitable: Yes</p> <p>Available: Potentially</p> <p>Viable: No – Building category B and reasonably dense development</p>	Nil
	Marie Jahoda	<p>Existing Use: Student Accommodation</p> <p>Approximate Age: 1990s</p> <p>Storeys: 2</p> <p>Plot area (approx.): 0.51ha</p> <p>Existing Floorspace: 2,921sqm (MJ)+ 160 (meeting house) = 3,081sqm</p> <p>Existing Building Condition: Category B.</p> <p>Covered by 2004 Masterplan: No</p>	<p>Modern 2 storey red brick 'U' shape building around landscaped courtyard. Occupied by School of Social Sciences. Separate single storey building (Meeting House - Chaplaincy) located to the west adjacent to Gaskell building. Existing buildings cover approximately 75% of the plot. Remainder of plot covered by car park surveyed at capacity during site visit.</p> <p>The plot is bound by 4 storey student accommodation to the north, West Spur Road to the south, Cleveland Road to the east and car park to the west. Two storey residential terrace properties are located off-campus further south of West Spur Road.</p>	<p>Suitable: Yes</p> <p>Available: Potentially</p> <p>Viable: Potentially</p>	Medium
	West Spur Road	<p>Existing Use: Car Park</p> <p>Approximate Age: N/A</p> <p>Storeys: N/A</p> <p>Plot area (approx.): 0.31ha</p> <p>Existing Floorspace: N/A</p> <p>Existing Building Condition: N/A</p> <p>Covered by 2004 Masterplan: No</p>	<p>Access leading to Isambard Complex, and buildings and car park north of the Road. Provision of car parking spaces south of the road.</p>	<p>Suitable: No – site shape/configuration unsuitable for new buildings (noting need to maintain access road)</p> <p>Available: Yes</p> <p>Viable: Yes</p>	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Social and Amenity Building	Existing Use: Student Amenity Approximate Age: 2000s Storeys: 3 (plant above) Plot area (approx.): 0.23ha Existing Floorspace: 651sqm Existing Building Condition: Category B Covered by 2004 Masterplan: Yes. Plot R2. Development implemented.	Modern 3 storey building with plant above used for student amenity purposes. Building covers approximately 25% of the plot with modern hard landscaped amenity area fronting building. The plot is bound by 3/4 storey student accommodation to the north, the 4/5 storey student accommodation to the south and west, and the temporary Chadwick building to the east. Two storey residential terrace properties are located off-campus, but in close proximity to the south west of the building further south of West Spur Road.	Suitable: Yes Available: Potentially available Viable: Potentially	Medium
2	Heinz Wolff	Existing Use: Academic Building Age (approx.): 1971 Storeys: 3 (plant above) Plot area (approx.): 1.51ha Existing Floorspace: 8,724sqm Existing Building Condition: Main building: Category B Plant Room: Category C. Greenhouse: Category B. Covered by 2004 Masterplan: Yes. In part. Car parking area I/P6 (implemented) and Development Zone A6 (not implemented) (takes-up a small proportion of the site)	Part of the core of the original university campus, completed in 1971 and comprises 3 storey building, with plant above at 4th and 5th storeys. Occupied by Department of Sports Science. Bound by extensive car park to the north and east, area of open space and Brunel University Press building to the south and Cleveland Road to the west. A part single/ 2 storey plant room and single storey greenhouse are located in the car park to the north. The north of the car park is adjacent to the boundary of the playing fields of Uxbridge High School (also designated Green Belt).	Suitable: Yes Available: No Viable: Potentially	Nil
	Bragg	Existing Use: Academic Building Age (approx.): 1979 Storeys: 1 Plot area (approx.): 0.37ha Existing Floorspace: 1,270sqm Existing Buildings: Category C Covered by 2004 Masterplan: In part – car parking area I/P7.	Part of the core of the original university campus, completed in 1979 and comprises a single storey building and car park. The building is used as the Experimental Techniques Centre and comprises approximately 75% of the plot with the remainder comprising soft landscaping and car park. The site is bound by the North Loop Road to the north, the 2/3 storey Halsbury Building to the south, 4 and 5 storey buildings of the Lancaster Complex to the east and car park to the west. The north of the campus boundary is the playing fields of Uxbridge High School (also designated Green Belt). This part of the playing field has recently been developed for a 3-4 storey indoor sports facility.	Suitable: Yes Available: No Viable: Yes	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Halsbury	<p>Existing Use: Academic Building</p> <p>Built (approx.): 1971</p> <p>Storeys:2/3</p> <p>Plot area (approx.): 0.61ha</p> <p>Existing Floorspace: 7,936sqm</p> <p>Existing Buildings: Category C (out-of-date – the building has just been subject to a significant capital works programme to extend its economic life)</p> <p>Covered by 2004 Masterplan: In part – car parking area I/P7.</p>	<p>The plot has been intensively developed and is part of the original core university campus, completed in 1971. The main building is part 2/3 storeys with plant above and is occupied by the Department of Education.</p> <p>Additional 2 storey buildings also occupy the south of the plot, fronting the entrance to the main building and are occupied by the Graduate School for Postgraduates and Early Career Researchers.</p> <p>The plot is centrally located within the campus and is bound by the Bragg building and car park to the north, the Quad courtyard to the south, a 6 storey building of the Lancaster Complex to the east and car park to the west.</p>	<p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>	Nil
	John Crank	<p>Existing Use: Academic Building</p> <p>Built: 1968</p> <p>Storeys: part 2/7 (with plant above)</p> <p>Plot area (approx.): 0.34ha</p> <p>Existing Floorspace: 3,822sqm</p> <p>Existing Buildings: Category C.</p> <p>Covered by 2004 Masterplan: No</p>	<p>The plot has been intensively developed and is part of the original core university campus, completed in 1968. The building comprises part 2 storey building with part 7 storey tower element with plant above. The 7 storey element is one of the tallest buildings on site. The 2 storey element covers the majority of the plot.</p> <p>The plot is centrally located within the campus and is bound by the 3 storey Halsbury building and a 6 storey building of the Lancaster Complex to the north and east, the 6 storey Art Centre to the south, and the Quad courtyard to the west.</p>	<p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>	Nil
	Arts Centre / Gordon Hall	<p>Existing Use: Art Centre</p> <p>Built: 2006</p> <p>Storeys: part 1/6</p> <p>Plot area (approx.): 0.15</p> <p>Existing Floorspace: 2,931sqm</p> <p>Existing Buildings: Category A</p> <p>Covered by 2004 Masterplan: Yes (forms part of Zone R4)</p>	<p>The plot comprises two modern buildings completed as part of the wider Lancaster Complex in 2006. The single storey building on the north of the plot is an art centre open to students, staff and members of the public.</p> <p>The 6 storey building on the south of the plot is Gordon Hall which comprises 100 rooms of student accommodation. This plot is centrally located and coverage is intensively developed. The close proximity of the buildings would not allow the single storey Arts Centre to be intensified without adversely affecting the accommodation in Gordon Hall.</p> <p>The plot is bound by the 2/7 storey John Crank building to the north, 4 storey student accommodation to the south, the River Pinn to the east and the 3 storey Lecture Centre to the west.</p>	<p>Suitable: Yes</p> <p>Available: Potentially</p> <p>Viable: No</p>	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Lancaster Complex	<p>Existing Use: Student Accommodation</p> <p>Age (approx.): 2006</p> <p>Storeys: part 4/5/6</p> <p>Plot area (approx.): 1.07ha</p> <p>Existing Floorspace: 2,986sqm</p> <p>Existing Buildings: Category A</p> <p>Covered by 2004 Masterplan: Yes (forms part of Zone 4)</p>	<p>Recently developed plot completed in 2006. The buildings provide a conference centre and office space along with 398 rooms over five buildings from 4 storeys in height stepping up to 5 and 6 storeys towards the centre of the campus. The plot is intensively covered by the existing buildings, with the remainder covered by landscaping; limited areas of parking which are predominantly for disabled users located adjacent to the blocks; and internal roads providing access for service and emergency vehicles. The plot includes some of the tallest buildings on campus.</p> <p>The plot is bound by the North Loop Road to the north, River Pinn to the south and east and 2/7 storey John Crank and 3 storey Halsbury buildings to the west.</p> <p>The eastern building line is adjacent to a 1 in 100 year flood risk zone which extends into the landscaped area of the plot adjacent to the River Pinn. Three storey residential properties are located off-campus further north of the campus boundary.</p>	<p>Suitable: In part (part flood-plain)</p> <p>Available: Potentially</p> <p>Viable: No</p>	Nil
	Sports Centre	<p>Existing Use: Sports Centre</p> <p>Age (approx.): 1972</p> <p>Storeys: 2</p> <p>Plot area (approx.): 1.04ha</p> <p>Existing Floorspace: 5,569sqm</p> <p>Existing Buildings: Category C</p> <p>Covered by 2004 Masterplan: Yes (Zone A9)</p>	<p>The plot has been intensively developed as part of the core of the original university campus, completed in 1972. It comprises a 2 storey brick building and dome extension which covers approximately 30% of the plot and is in use as the sport centre, open to students, staff and members of the public. The remainder of plot covered by car park and landscaping adjacent to the River Pinn.</p> <p>The plot is bound by the North Loop Road to the north and east, the 3/4 storey athletics centre and 6/7 storey student accommodation to the south and River Pinn to the west.</p> <p>The majority of the undeveloped part of this plot and also the sports centre building lie within Flood Zone 3 which is at risk of 1 in 100 years flooding. The Estate Strategy identifies a longer term strategy to relocate existing buildings out of Flood Zone 3 where possible.</p>	<p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>	Nil
	St John	<p>Existing Use: Academic Building</p> <p>Age (approx.): 2,495sqm</p> <p>Storeys:</p> <p>Plot area (approx.): 1.31ha</p> <p>Existing Floorspace: 2,495sqm</p> <p>Existing Buildings: Category C</p> <p>Covered by 2004 Masterplan: Yes (Zone A10) (not implemented)</p>	<p>The plot comprises a 2 storey building set in the north east corner of the campus which covers approximately 25% of the plot with the remainder comprising formal/informal parking and an area currently used as storage.</p> <p>The part of the plot currently used as informal overflow car parking was previously occupied by a temporary building that has since been demolished. This part of the site is to be redeveloped in accordance with the masterplan under the existing approved outline planning consent.</p> <p>The part of the plot currently used as storage is a triangular area of approximately 0.1ha adjacent to the northern campus boundary and is constrained in terms of size, layout, access and adjacent uses.</p> <p>The plot is bound by 2 storey residential properties to the north, Eastern Gateway to the south, Kingston Lane to the east and the North Loop Road to the west.</p>	<p>Suitable: Yes</p> <p>Available: No</p> <p>Viable: Yes</p>	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Eastern Gateway	Existing Use: Academic Building Age (approx.): 2000s Storeys: part 4/5 Plot area (approx.): 0.67ha Existing Floorspace: 8,722sqm Existing Buildings: Category A Covered by 2004 Masterplan: (Yes Zone A10)	Modern 4/5 storey building occupied by the Business School faculty and also houses main reception. This plot has been recently developed with the majority covered by the existing building. The existing height reflects the height of the adjacent Mary Seacole building, but is taller than older buildings within the vicinity, such as the Sports Centre and Science Park. It provides a step up from the campus boundary from Kingston Lane toward the Bishop Complex.	Suitable: Yes Available: No Viable: No	Nil
	Mary Seacole	Existing Use: Academic Building Age (approx.): 2000s Storeys: Plot area (approx.): 0.67ha Existing Floorspace: 4,215sqm Existing Buildings: Category A Covered by 2004 Masterplan: Yes (Zone A12)	Modern 4 storey building occupied by School of Health Sciences and Social Care. Similarly to the Eastern Gateway this plot has been recently developed with the majority covered by the existing building. The existing height reflects the height of the adjacent Eastern Gateway building, but is taller than older buildings within the vicinity, such as the Sports Centre and Science Park. It provides a step up from the campus boundary from Kingston Lane toward the Bishop Complex.	Suitable: Yes Available: Potentially Viable: No	Nil
	Indoor Athletics Centre	Existing Use: Athletics Centre Built (approx.): 2000s Storeys: 3-4 Plot area (approx.): 0.64ha Existing Floorspace: 3,141sqm Existing Buildings: Category B Covered by 2004 Masterplan: Yes (Zone A11)	The plot comprises a modern purpose built athletics centre equivalent to 3/4 storeys in height and spanning majority of plot. A soft landscape buffer to the east separates the building from the internal road. The plot is bound by the extension to the sports centre to the north, 5, 6 and 7 storey student accommodation to the south and west and the internal Loop Road to the east.	Suitable: Yes Available: Potentially Viable: No	Nil
	Hamilton Centre	Existing Use: Social Facilities and Student Union Age (approx.): 1967 Storeys: 2 Plot area (approx.): 0.65ha Existing Floorspace: 7,345sqm Existing Buildings: Category C Covered by 2004 Masterplan: No	The plot has been intensively developed as part of the core of the original university campus, completed in 1967. The majority of the plot is occupied by a 2 storey building for student union and leisure uses with associated structured over resulting in an additional storey in height. An adjoining single storey building occupied by the University press is located north of the main building, along with an area for service access. The plot is located in the centre of the campus and is bound by the 3 storey Heinz Wolff building to the north, the concourse and 4 storey Bannerman Centre to the south, the Quad courtyard to the east and an area of open space to the west.	Suitable: Yes Available: No Viable: Yes	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	The Quad	Existing Use: Courtyard Age (approx.): N/A Storeys: N/A Plot area (approx.): 0.18ha Existing Floorspace: N/A Existing Buildings: N/A Covered by 2004 Masterplan: No	Area of soft landscaping (grass) around hard landscaped (steps) courtyard area which separates the change of levels between the Hamilton Centre, Lecture Centre, Halsbury and John Crank Buildings.	Suitable: No (important amenity space and setting of historic buildings) Available: Yes Viable: Yes	Nil
	Wilfred Brown/Michael Sterling	Existing Use: Admissions and Academic Buildings Age (approx.): 1967 / Storeys: Plot area (approx.): 0.61ha Existing Floorspace: 5,346sqm (MS) + 4,043sqm (WB) = 9,389sqm Existing Buildings Wilfred Brown Building: Category C Michael Sterling Building: Category A Covered by 2004 Masterplan: Yes (Zone A4)	The plot was developed as part of the core of the original university campus initially occupied by the Wilfred Brown building, completed in 1967. A subsequent modern extension known as the Michael Sterling building was added on the eastern part of the plot. The majority of the plot is occupied by the two buildings. The Wilfred Brown building is part 2/3/4 storeys and is occupied by the Admissions Department. The Michael Sterling building is 4 storeys in height and is occupied by the School of Engineering and Design. A small area for service vehicles is located on the south of the plot. The plot is bound by an area of open space to the north, car park to the south, the 4 storey library to the east and pond fronting Cleveland Road to the west.	Suitable: Yes Available: No Viable: No	Nil
	Car Park (east of Tower Complex)	Existing Use: Car Park Age (approx.): N/A Storeys: N/A Plot area (approx.): 1.00ha Existing Floorspace: N/A Existing Buildings: N/A Covered by 2004 Masterplan: Yes (car parking area)	Large surface car park on campus used for visitor, student and staff parking. Site is bound by 3/4 storey Wilfred Brown building to the north, southern campus boundary with Site 4 to the south, Tower Complex to the east and landscaping fronting Cleveland Road to the west. Two storey residential properties are located west of Cleveland Road and south of the footpath which separates Sites 2 and 4.	Suitable: Yes Available: Potentially Viable: Yes	High

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Bannerman Centre (and extension)	Existing Use: Library and Student Centre Age (approx.): 1973 / 2000s Storeys: 4 Plot area (approx.): 0.64ha Existing Floorspace: 12,040sqm Existing Buildings: Category Part B/Part C Covered by 2004 Masterplan: Yes (Zone A7)	The plot was developed as part of the core of the original university campus initially occupied by the Bannerman Centre, completed in 1967. A subsequent modern extension was added on the eastern part of the plot. The majority of the plot is occupied by the building which is 4 storeys in height and occupied by the Library and Student Centre. A small area for parking is located on the south of the plot. The plot is centrally located on campus bound by the concourse and 2 storey Hamilton Centre to the north, the Tower Complex to the south, the 3 storey Lecture Centre to the east and 4 storey Michael Sterling building to the west. The condition of the original part of Bannerman Centre has been assessed by the Estate Strategy as Category C and will require repair/maintenance in the short to medium term. The extension has been assessed as Category B.	Suitable: Yes Available: No Viable: Potentially	Nil
	Lecture Centre	Existing Use: Academic Building Age (approx.): 1960s Storeys: 3 plant above Plot area (approx.): 0.55ha Existing Floorspace: 9,007sqm Existing Buildings: Category C Covered by 2004 Masterplan: Yes (Zone A8)	The plot was developed as part of the core of the original university campus initially occupied by the Bannerman Centre, completed in the 1960s. The majority of the plot is occupied by the building which is 3 storeys in height and occupied by the Lecture Centre which is Grade II listed. A small area of soft landscaping is located on the south of the plot and provides separation between the Howell Centre. The plot is centrally located on campus bound by the Quad courtyard to the north, the 4 storey Howell Centre to the south, 6 storey student accommodation to the east and the 4 storey Bannerman Centre to the west.	Suitable: No (listed buildings) Available: No Viable: Potentially	Nil
	Tower Complex (A-D)	Existing Use: Academic Building Age (approx.): 1967 Storeys: Plot area (approx.): 2.00ha Existing Floorspace: 14,580sqm Existing Buildings: Category C Covered by 2004 Masterplan: No	The complex forms part of the core of the original university campus, completed in 1967 and comprises mainly 2 storey accommodation, with tower elements of 4 storeys with plant above (Tower B) or 5 storeys (Towers, A, C and D). The complex is occupied in conjunction with the Howell building by the School of Engineering and Design. The buildings were originally designed by Richard Sheppard and are <u>locally listed</u> , having been considered to have social and community significance. Approximately 25% of the site (including Tower D and parts of Tower C) are located within the flood plain.	Suitable: Potentially suitable (existing buildings are locally listed and approximately 25% of the site is flood plain) Available: No Viable: Yes	Nil
	Antonin Artaud	Existing Use: Academic Building Age (approx.): 1967 Storeys: 2 Plot area (approx.): 0.12ha Existing floorspace: 2,848sqm Existing Buildings: Category B Covered by 2004 Masterplan: No	The plot forms part of the core of the original university campus, completed in 1967 and comprises a 2 storey building used by the School of Arts for performance and studio space in the south west corner of the Site 2. The plot is bound by the large area of car park to the north and west, the South Loop Road to the south and Tower B and the Joseph Lowe buildings to the east. Two storey detached residential properties are situated on the west of Cleveland Road and south adjacent to Site 4. All these residential properties are screened by the existing planting along the boundary. Further south is a vehicular access to Site 2 and a public footpath that runs between the boundaries of Site 2 and Site 4.	Suitable: Yes Available: No Viable: Potentially	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Joseph Lowe	Existing Use: Distribution and Maintenance Age (approx.): 1968 Storeys: par 1/2 Plot area (approx.): 0.18ha Existing Floorspace: 991sqm Existing Buildings: Category C Covered by 2004 Masterplan: No	The plot forms part of the core of the original university campus, completed in 1967 and comprises a part single / 2 storey building occupied by the distribution and maintenance departments. The plot is bound by the Tower Complex to the north, the South Loop Road to the south, car park to the east and the Antonin Artaud building to the west.	Suitable: Yes Available: No Viable: Yes	Nil
	Howell Centre	Existing Use: Academic Building Age (approx.): 1968 Storeys: 4 Plot area (approx.): 0.50ha Existing Floorspace: 4,791sqm Existing Buildings: Category C Covered by 2004 Masterplan: No	The plot was developed as part of the core of the original university campus initially occupied by the Bannerman Centre, completed in 1968. The majority of the plot is occupied by the building which is 4 storeys in height and occupied by the School of Engineering and Design in conjunction with the adjacent Tower Complex. A small area of soft landscaping is located on the east of the plot and provides separation between Saltash House (student accommodation). The plot is centrally located on campus bound by the 3 storey Lecture Centre to the north, the 2/4/5 storey Tower Complex to the south and west and 4 storey student accommodation to the east.	Suitable: Yes Available: No Viable: Yes	Nil
	Saltash Hall (and Medical Centre)	Existing Use: Student Accommodation / Medical Centre Age (approx.): 1966 Storeys: 4 Plot area (approx.): 1.24ha Existing Floorspace: 364sqm (medical centre) + 4,525sqm (halls) = 4,889sqm Existing Buildings: Saltash Hall: Category C Medical Building: Category B Covered by 2004 Masterplan: Yes (zone R4)	The plot was developed as part of the original core university campus with Saltash Hall completed in 1966 and the Medical Centre in 1967. The two buildings are centrally located within the plot, with Saltash Hall located adjacent to the River Pinn. Saltash Hall comprises 184 rooms of student accommodation over 4 storeys. The Medical Centre is located west of Saltash Hall and is a small single storey building. Soft landscaping separates Saltash Hall from the adjacent buildings. A larger area of open space occupies the north, south and west of the plot. The plot is bound by 6 storey student accommodation to the north, the South Loop Road to the south, 4 storey student accommodation to the east and the Tower Complex, Howell Centre and Lecture Centre to the west. The majority of the plot (including all buildings) lies within Flood Zone 3 and is at risk of 1 in 100 years flooding. The Estate Strategy identifies a longer term strategy to relocate existing buildings out of Flood Zone 3 where possible.	Suitable: No (flood plain) Available: No Viable: Potentially	Nil

Site	Building/Plot	Description		Assessment	Potential Capacity to Support New Development
	Chepstow Hall & Clifton Hall	Existing Use: Student Accommodation Age (approx.): 1969/1971 Storeys: 4 Plot area (approx.): 1.33ha Existing Floorspace: 4,718sqm (Chepstow) + 4,707 (Clifton) = 9,425sqm Existing Buildings: Category C Covered by 2004 Masterplan: Yes (Zone R5)	The plot was developed as part of the original core university campus and completed between 1969-1971 and comprises two halls of student accommodation, Chepstow and Clifton Hall providing 231 and 236 rooms respectively. Both Halls are 4 storeys in height. Clifton Hall occupies the north east of the plot and Chepstow Hall occupies the south west of the plot. A large area of open space separates the River Pinn along the majority of the western boundary of the plot. The plot is bound the Lancaster Complex to the north, the South Loop Road and 5 storey student accommodation to the south, the 6/7 storey student accommodation to the east, and 4 storey student accommodation to the west. The south west of the plot (encompassing Chepstow Hall) lies within Flood Zone 3 and is at risk of 1 in 100 years flooding.	Suitable: Partly (approx. half of site is in flood plain) Available: No Viable: Yes	Nil
	Bishop Complex	Existing Use: Student Accommodation Built: 2005 Storeys: Plot area (approx.): 0.86ha Existing Floorspace: Existing Buildings: Category A Covered by 2004 Masterplan: Yes (Zone R5)	Modern redeveloped plot for student accommodation completed in 2005. The accommodation provides a total of 698 rooms across 4 blocks of 6 and 7 storeys in height. Plot coverage is intensively developed with some landscaping, but no car parking. The existing height of the 7 storey buildings are some of the tallest on the campus. The plot is bound by the sports centre to the north, 5 storey student accommodation to the south, the athletics centre to the east and 4 storey student accommodation to the west.	Suitable: Yes Available: Potentially Viable: No	Nil
	Faraday Complex	Existing Use: Student Accommodation Age (approx.): 1990's Storeys: 5 Plot area (approx.): 0.76ha Existing Floorspace: 6,794sqm Existing Buildings: Category B Covered by 2004 Masterplan: Yes (Zone R5)	Modern redeveloped plot for student accommodation. The accommodation provides a total of 279 rooms across 3 blocks of 5 storeys in height. Plot coverage is intensively developed with some landscaping, but no car parking. The plot is bound by the 6/7 storey student accommodation the north, South Loop Road to the south, Loop Road and Science Park to the east and 4 storey student accommodation to the west. The western building line of two of the blocks is adjacent to a 1 in 100 year flood risk zone which covers the adjacent Chepstow Hall.	Suitable: Yes Available: Potentially Viable: No	Nil
	Brunel Science Park Russell / Gardiner / Elliot Jacques	Existing Use: Science Park Age (approx.): 1990's Storeys: 1-2 Plot area (approx.): 2.47ha Existing Floorspace: 2,821sqm Existing Buildings: Category B Covered by 2004 Masterplan: Yes – Partly within Zone A13 (small scale development only)	The plot comprises one part single / 2 storey building (Elliot Jacques) and two 2 storey buildings (Russell and Gardiner) set in the south east corner of the campus set around a central car park. Additional car parks are also located on the southern boundary east and west of the Gardiner building. The Elliot Jacques building is occupied by the Law School, with the other two buildings forming Brunel Science Park. The plot is bound by the 4 storey Mary Seacole building to the north, southern campus boundary with Site 4 to the south, eastern campus boundary with Kingston Lane to the east and athletics centre and 5 storey student accommodation to the west.	Suitable: Yes Available: Potentially Viable: Yes	High

Summary of Capacity Assessment

	Net Site Area	Gross Development Capacity	Net Discounted Development Capacity	Replacement Floorspace Need Generated by Demolitions	Net Development Capacity
Nil Potential (non-qualifying sites)	24.91ha	-	-	-	-
Medium Potential	0.74ha	6,660sqm	3,330sqm	-3,732sqm (discounted to -1,866sqm)	1,464sqm
High Potential	3.47ha	31,230sqm	31,230sqm	-2,821sqm	28,409sqm
Total	29.12ha	37,890sqm	34,560sqm	-4,687sqm	29,873sqm

GVA
June 2014



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	c/o Agent		
First name			
Last Name			
Organisation (if relevant)			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Miss		
First name	Isabel		
Last name	Keppel		
Company	CBRE		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Chapters 2, 3 and 4
Table or Figure Number; or	
Map Number (Atlas of Changes)	Hayes West

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Generally we believe the plan is sound, however we believe to enhance the prospects of the plan being found sound in particular in terms of being positively prepared, effective and consistent with national policy, an additional site (25-31 Fairview Business Centre) should be added to the Site Allocations and Policies Map.

The aspiration for the regeneration of canalside sites, as emphasised on Page 88 of the Site Allocations DPD where it is stated that “some sites along the canal frontage would make a greater contribution to regeneration in Hayes if they were subject to mixed use development” could be strengthened through the inclusion of this site in the allocations. The inclusion of this site would strengthen the wider regeneration aspirations for Hayes as emphasised in the Allocations document and in the adopted Core Strategy and would support the delivery of housing in the area by specifically allocating the site for residential led mixed use development. The allocation would be consistent with national policy in that it will facilitate the delivery of sustainable development in accordance with the NPPF. Please see our accompanying letter for further details.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

We consider the addition of a specific site allocation (Units 25-31 Fairview Business Centre). As set out within the Site Allocations DPD and Core Strategy this will ensure that the Council's aspiration for canalside regeneration "some sites along the canal frontage would make a greater contribution to regeneration in Hayes if they were subject to mixed use development" (Page

88) and the wider regeneration strategy in Hayes is effective. Additionally, this site would contribute to the delivery of objectively assessed housing need within the Borough. This addition will also ensure the plan is effective, positively prepared and consistent with national policy.

Please see the attached cover letter for further details.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We would welcome the opportunity to participate in the examination in order to support aspirations set out in the Proposed Site Allocations and Policies Map with regard to regeneration and housing delivery in Hayes.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

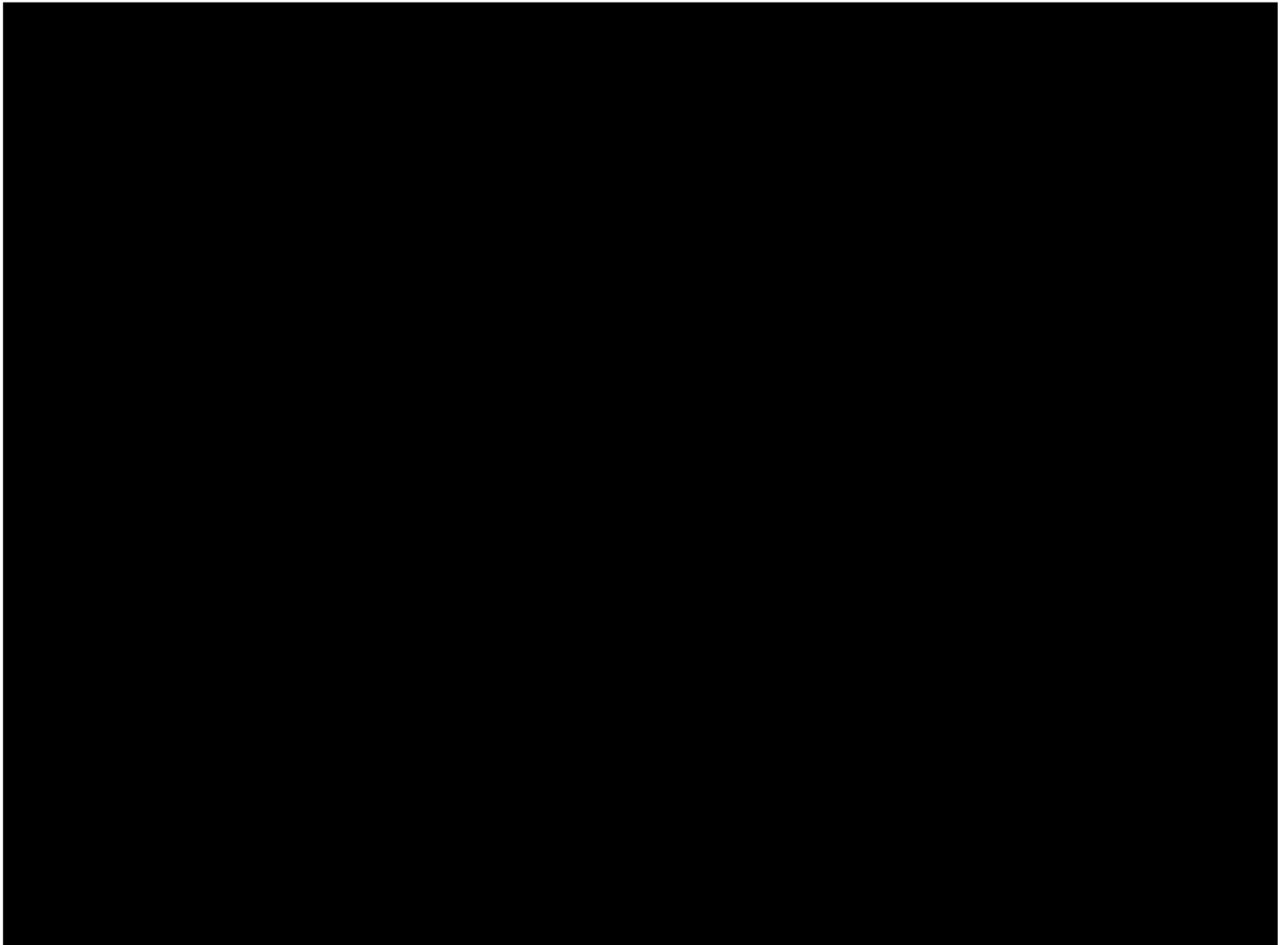
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Planning Department
Civic Centre
Uxbridge Road
UB8 1UW

4 November 2014

Dear Sir/Madam

FAIRVIEW BUSINESS PARK, HAYES – REPRESENTATIONS TO THE PROPOSED SUBMISSION VERSION OF THE HILLINGDON LOCAL PLAN PART 2

CBRE Limited ('CBRE' hereafter) has been instructed on behalf of CBRE Global Investors ('CBREGI' hereafter) to submit representations to Hillingdon Borough Council's ('the Borough Council' hereafter) Proposed Submission Local Plan Part 2 (September 2014) with respect to CBREGI's interests at Fairview Business Park, Hayes. The Local Plan Part 2 comprises the proposed Development Management Policies, Policies Map and Site Allocations Document. We have focussed our comments on the Policies Map and Site Allocations document. CBREGI welcomes the opportunity to engage with the Borough Council in respect of its emerging planning policies, and specifically the Proposed Submission Site Allocations and Policies Map.

SITE LOCATION AND DESCRIPTION

The site is located within Hayes; it is located in an area of mixed residential and industrial use. The site is approximately 0.88ha, and is predominantly occupied by a warehouse building, which is circa 6m high. The warehouse building comprises a number of industrial units (units 25-31) and there is also a surface car park on site. The uses on site are a mix of B1 (Business) and B2 (General Industrial) use.

The site is bound by the Grand Union Canal to the north, and a part three part four storey vacant office building to the east (Union House, 23 Clayton Road) beyond that is a part 4, part 5, part 6 storey residential development (14-16 Clayton Road). Immediately south of the site is Clayton Road, a residential street, characterised by terraced properties. Immediately to the west is a vehicle show room which is also owned by CBREGI (this is not available for development within the plan period, but will potentially be available in the long term). The west of the site is characterised by industrial and manufacturing uses, these industrial uses continue and intensify further west of the site. Further north, east and south of the site is dominated by residential neighbourhoods. The site will be further enclosed by residential uses as a number of adjacent sites have been allocated in the Proposed Submission Site Allocations for residential-led mixed use development and a number have extant planning permissions or are currently under construction. Additionally, Hayes has been identified as a focal point for growth and regeneration within Hillingdon.

Immediately south of the site is the Old Vinyl Factory site (allocated as Site SA2) along with the Gatefold building. These sites situated on Blyth Road, have planning permission granted for large-scale mixed use developments, comprising residential, leisure, retail and commercial floor space. On completion these sites

combined will deliver approximately 642 residential units of which 360 units are being brought forward in the initial plan phase 2011-2016. To the south west of the site is Enterprise House (allocation SA1), this site has been allocated for mixed use office and residential, with the potential to accommodate approximately 75-80 dwellings. Additionally, the Eastern end of Blyth Road has also been allocated in the Proposed Submission Site Allocations, again for residential-led mixed use development. This area will deliver 248 residential units, a number of which are already under construction. Additionally, 20 Blyth Road an adjacent site was granted permission in 2012 (1425/APP/2011/3040) for the comprehensive redevelopment of the site to create 120 residential units. The site allocations and recent planning approvals have altered the area which is becoming increasingly residential in nature.

Existing Planning Policy Context

On the Policies Map which accompanies the 'saved' policies of the Unitary Development Plan (UDP) (adopted 1998), the site is allocated as an Industrial and Business Area. These policies exist to protect employment and industrial land.

The 'saved' policies of the UDP are gradually being replaced by the Local Plan Parts 1 and 2. Therefore in addition, further policies are applicable to the site. Notably Policy E1 of the Local Plan Part 1 (Adopted 2012) identifies specific areas of land which are to contribute to the managed release of employment land across the borough. Part of the Blyth Road area of Hayes was identified within the Local Plan Part 1 as an area with potential for release from employment use. This managed release is due to results of an Employment Land Study which concluded that Hillingdon has a surplus of employment land at present.

Additionally, the Local Plan Part 1 identifies the strategic benefits that will be delivered to Hayes as a result of Crossrail development. CBREGI supports the overall vision for Hayes as outlined in the Local Plan Part 1, where it is stated that growth and regeneration will be focused upon Hayes Town Centre as a direct result of the Crossrail development. Additionally as the site is located within the Heathrow Opportunity Area, Policy E3 (Strategy for Heathrow Opportunity Area) is of relevance. Within Table 5.3 which details that the Council will aim to maximise regeneration and growth opportunities, in relation to the Grand Union Canal, there is specific reference to the role of the Grand Union Canal and how the presence of the Canal has the potential to provide an attractive waterfront setting to regeneration projects.

Proposed Allocation

CBREGI consider that this site should be identified specifically within the Local Plan Part 2 as a 'residential-led mixed use site'. The allocation of the site would reflect the ambitions of the Borough Council insofar as rebalancing the surplus of employment land and providing high quality homes and employment space across the Borough. Additionally, the development of this site would accord with statements within the Proposed Submission Site Allocations Document where "it is considered that some sites along the canal frontage would make a greater contribution to regeneration in Hayes if they were subject to mixed use development" (Page 88). Given the location of the site CBREGI contends that the site's proximity to Hayes Town Centre, Hayes and Harlington Rail Station and a number of other sites allocated for residential-led mixed use development, this site has potential to provide high quality residential development. It is our understanding that due to the high PTAL level onsite (4) and the size of the site, it could accommodate a minimum 50 dwellings on site, or significantly more should it be developed together with the adjacent site (Union House).

Phasing

In terms of phasing, the site would be available in the short to medium term which would assist the Borough Council in meeting their 5 year land supply of housing. The land to the west of the site (and also owned by CBREGI) is currently occupied by a vehicle showroom which would also potentially become available in the longer term beyond the plan period but would sit comfortably in a residential environment in the short term.

We understand that the owners of the site to the east are promoting the site for residential development, and therefore there are opportunities for partnership working to allow these two sites to come forward together.

Policies Map

The current proposals map from the 'saved' UDP will be replaced by the Local Plan Part 2: Policies Map. CBREGI support the removal of the 'Industrial and Business Area' allocation in the Submission Policies Map. They continue to recognise the value of the site's strategic proximity to Hayes Town Centre, as allocated in the Submission Policies Map. Additionally, CBREGI supports the allocation of a number of adjacent sites, as sites for residential-led development.

These factors, combined with the overall vision for Hillingdon, lead CBREGI to the conclusion that the site at Fairview Business Park should also be allocated for residential-led mixed use development within the Policies Map.

Site Allocations Document

CHAPTER 2: A VISION FOR HILLINGDON

CBREGI supports the principles contained within chapter 2 in that the Borough Council, through the Proposed Submission Site Allocations, aims to ensure that Hillingdon will prosper throughout the plan period by implementing a number of policies and strategies centred upon seven key objectives. The Borough Council contends that Hillingdon will prosper if economic growth is concentrated within Hayes and West Drayton without ignoring local centres. Additionally CBREGI wholeheartedly supports the Borough Council's vision of improving accessibility to local jobs, housing and facilities in order to enhance the quality of life of residents. Specifically, the Borough Council intends to focus employment growth within the Hayes and West Drayton Corridor, utilising Crossrail development as the catalyst for growth and regeneration. The intention to modernise Hayes Town Centre as a public transport interchange is welcomed.

CBREGI supports the principles contained within Chapter 4 of the Local Plan Part 1 in that the Borough Council, through the Site Allocations, will take a positive approach to development which reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF) (March 2012) and the importance that the Government and Borough Council attach to securing economic recovery, both nationally and locally.

The NPPF explicitly states that sustainable development 'should be seen as a golden thread running through both plan-making and decision-taking' and the allocation of the site is certainly capable of fulfilling that principle. The NPPF continues to note that for plan-making, Local Planning Authorities should positively seek opportunities to meet the development needs of their area and that for decision-taking approving development proposals which accord with the development plan without delay. This approach is reflected in Chapter 2, which incorporates that 'golden thread' from the outset.

CBREGI considers that this site has the potential to accommodate a residential-led mixed-use development. This would assist the Borough Council in meeting a number of the objectives set out in the Proposed Submission Site Allocations. With regard to the site's surroundings, CBREGI recognises that development proposals should be planned with special regard to the industrial and employment land to the west of the site. However, CBREGI contends that the location of the site, and the potential to deliver a high quality, sustainable scheme, would ensure that Hillingdon Borough meets their objectives going forward.

CHAPTER 3: NEW HOMES

CBREGI supports the Borough Council's vision to deliver and exceed its minimum strategic dwelling requirements. The current target is for Hillingdon to provide 4,250 dwellings across the plan period for the ten year period between 2011-2021, moving beyond 2021 there is a requirement to increase this provision to 6,375 dwellings between 2011-2026. The London Plan (2011) targets the provision of housing in Hillingdon,

stating that between 2011-2021 the London Borough of Hillingdon should provide 4,250 dwellings, this will potentially be increased in January 2014 following the publication of the Further Alterations to the London Plan. The alterations propose an increase in dwelling provision stating that Hillingdon should provide a total of 5,593 dwellings between 2011-2021. This is a higher proposed target than that proposed in the Borough Council's plan.

The Proposed Submission Site Allocations will provide sites which would help to achieve this goal in the short and medium term, however only broad site locations have been identified for the last 5 years of the development plan. Hayes, in accordance with Chapter 2 of the Proposed Submission Site Allocations, is a strategic location in the Borough and will see development and regeneration benefits in light of the development of Crossrail; therefore the town is located in a suitable area for the intensification of housing development. The site is an extremely sustainable location, next to the town centre and Hayes and Harlington train station.

The NPPF seeks to significantly boost the supply of housing and explicitly states that applications for housing should be considered in the context of the presumption in favour of sustainable development. For the reasons set out above, CBREGI consider that the site could assist the Borough Council in meeting its housing target through accommodating a sustainable high quality mixed use development to meet local housing and economic needs, in a location that presents a significant opportunity for regeneration. CBREGI further considers that the site is available, offers a suitable location for development, is achievable, offers a realistic prospect that residential development can be delivered early in the Plan period and that the development of the site is financially viable.

As aforementioned multiple adjacent sites are also allocated for residential development, it is in the view of CBREGI that in order to achieve consistent high quality development within Hillingdon and deliver the level of housing required the site could be brought forward in conjunction with other developments.

CHAPTER 4 – REBALANCING EMPLOYMENT LAND

CBREGI note through chapter 4 that there is currently a high volume of designated employment land within Hillingdon. At present it is recognised by the London Borough of Hillingdon that this employment land is focused on the industrial areas within Hayes. It is understood and valued by CBREGI that the Council wishes to retain the highest quality employment land to ensure that the future economic growth of the Borough is secured. However, it is also acknowledged in Policy E1 of the Local Plan Part 1 and within the Proposed Submission Site Allocations that certain areas within the Borough have been allocated for managed release and thus redevelopment. Additionally, it is understood that although a large proportion of Hayes Industrial Area is allocated by way of the London Plan, the site owned by CBREGI is located outside of the Strategic Industrial Area as now proposed by the Council. The Council has sought to remove the site's previous Strategic Industrial Location in order to support the regeneration of Hayes through the development of sites fronting the Grand Union Canal (Page 88, Proposed Submission Site Allocations). CBREGI are wholly supporting of the Council's approach in this regard.

Additionally, those sites allocated as part of the Strategic Industrial Area, specifically site 5 (Blyth Road, Clayton Road, and Printing house Lane) have a range of industrial uses, and retain a diversity of industrial uses, however it is recognised that some of the uses that front the Canal, which the site in question does, are not suitable and would make a greater contribution to the regeneration of Hayes if they were subject to mixed use development. Therefore, it is in the view of CBREGI that the site would provide greater benefits to Hayes if allocated for residential-led mixed use development.

PERMITTED DEVELOPMENT RIGHTS

Additionally in accordance with current Government legislation the premises occupying the site is permitted under the General Permitted Development Order to change from B1(a) into Residential (C3), subject to prior

approval covering flooding, highways and transport issues and contamination. This current level of permitted development will expire in May 2016. However, Government has proposed to extend the permitted development rights, which will continue to cover the site. In light of these, it would be feasible for the client to change the use of the site into residential use under these permitted development rights. However, CBREGI would preferably support bringing the scheme forward holistically with adjacent sites and in consultation with the Borough Council in order to provide a comprehensive and consistent approach to sustainable mixed-use development and regeneration in Hayes.

For the reasons cited above, CBREGI considers that the site should be allocated as a residential-led mixed use development. CBREGI considers that there is an opportunity to bring forward development which would reflect the long-term vision for the Borough. We would be happy to assist the London Borough if they require further evidence to support the allocation of the site in accordance with paragraph 158 of the NPPF. However, it is our view that the site could comfortably accommodate the proposed redevelopment and there is no impediment to the allocation.

I trust that the above is helpful. I would be grateful if the Council could confirm receipt of this letter and that the representations have been duly made. I would also be grateful if we as agents for CBREGI can be kept up-to-date on the process of consideration of these representations.

Yours faithfully



**ISABEL KEPPEL
SENIOR PLANNER**

CBRE Limited for and on behalf of CBRE Global Investors.

Enc. Site Plan

Site Plan:



LONDON BOROUGH OF HILLINGDON LOCAL PLAN PART 2

**Development Management Policies
[Proposed Submission Version September 2014]**

STATEMENT OF REGULATION 19 REPRESENTATION

by A. S. Kassim DipTP(Dist) MSc FRTPI

Site: Ruislip Manor Sports and Social Club, Grosvenor Vale, Ruislip

INTRODUCTION

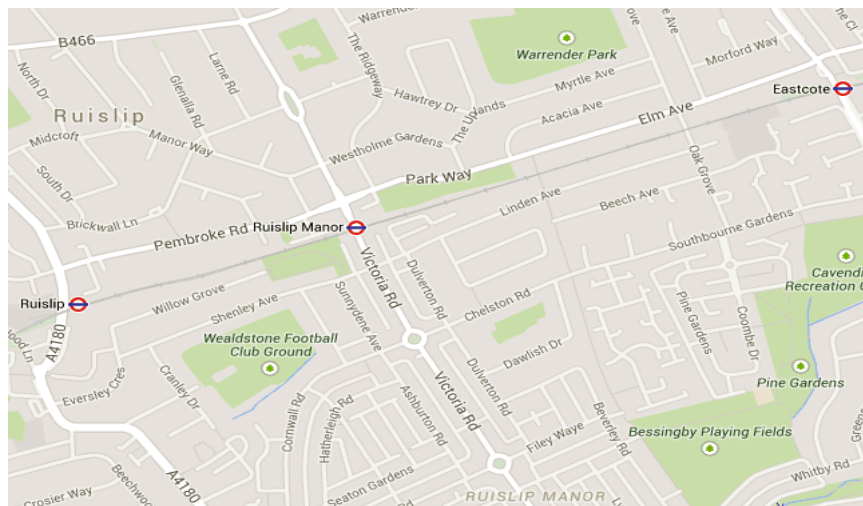
1. The objection hereafter is against the inclusion of the above site in the London Borough of Hillingdon's Local Plan: Part 2 Site Allocations and Designations, as part of the proposed Green Chain Link: Site 16 – Ruislip Green Chain Link. It is submitted on behalf of the freehold owners of the land; the Trustees of the Charity known as the '*Khoja Shia Ithnaasheri Muslim Community of London*' (KSIMC). The current occupiers/users of the sport ground, the Wealdstone Football Club, have also expressed a wish to object to the designation.

2. The site area of the subject sports ground is 4.9 hectares (circa 12 acres), and is laid out into three parts:

- The football pitch and its associated stands,
 - The social club and ancillary buildings
 - Open sports ground, used for training as well as other sports.
- and - Two telecommunication Masts originally for Vodafone and O2 as well as earlier one for T Mobile

3. Ruislip Manor Sports Ground is a large, almost square shaped, bounded on all sides by private mainly semi-detached housing. It has one main entrance via Grosvenor Vale which is a two lane metalled access road. The subject site comprises a sports and social club with a football pitch and ancillary playing fields, including a cricket pitch and archery range, with a substantial number of single storey detached and adjoining buildings. They include the main clubhouse, changing rooms, toilets and stores. There are also covered and uncovered terraces and stands surrounding the perimeter of the football pitch, with a separate cricket pavilion, archery pavilion and machinery store. Almost all of the buildings are substantially built with masonry walls and flat or pitched roofs. Therefore the site is not simply an open sports ground but, as described above, it has many buildings, other sports pitches and a fully-fledged football ground with stands and terraces.

4. The site is located in the Ruislip Manor Ward within the administrative boundaries of the London Borough of Hillingdon. Virtually all of the housing stock in Ruislip Manor was laid out as a single private housing estate between 1933 and 1939. They were all built to one of two basic types, mostly in terraces of four or six, although a few were semi-detached. The new homes were originally priced within the reach of working people and many were sold to families who had come to London to find work during the depression. Other buyers came from the industrialised parts of West London, such as Acton in search of an affordable rural retreat.



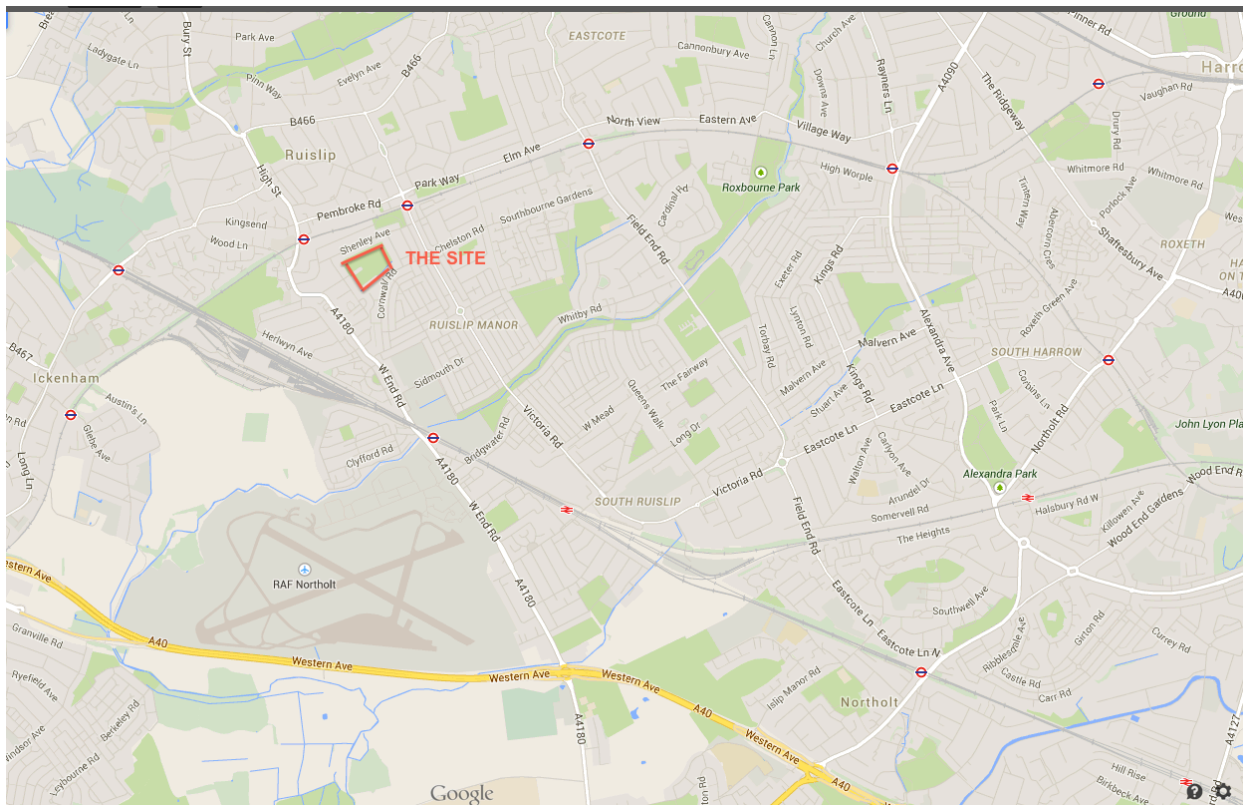
LOCATION PLAN SHOWING THE SUBJECT SITE

(THE WEALDSTONE FOOTBALL GROUND)

STATEMENT OF REGULATION 19 REPRESENTATION

Site: Ruislip Manor Sports and Social Club, Grosvenor Vale, Ruislip

5. The site has an excellent level of accessibility to public transport being within a short walking distance to the Ruislip and Ruislip Manor Underground Stations. It is also within easy reach of numerous bus services running along Victoria Road to the west and the A4180 (West End Road/High Street) to the east. The Main Line Station of South Ruislip, as well as the A40/M40 trunk road, are also within easy reach of the site and supplement the accessibility potential of the site. RAF Northolt is located circa 1.5 kilometre distance and this explains the close historical association between the playing fields and the RAF. In fact, the current owners purchased the freehold interest of site from the RAF in 2000 when it was known then as the RAF Recreation Ground



A MAP SHOWING THE RELATIONSHIP OF THE SITE WITH VARIOUS MODES OF TRANSPORT (Underground Stations, Main Rail Stations and major access roads) AS WELL AS THE PROXIMITY OF RAF NORTHOLT

STATEMENT OF REGULATION 19 REPRESENTATION
Site: Ruislip Manor Sports and Social Club, Grosvenor Vale, Ruislip

6. When KSIMC acquired the site in 2000, the occupier/user was the Ruislip Manor and Wealdstone Youth Team. It was their main football ground and social club until 2008, when it became officially recognised as the main ground for Wealdstone Football Club. They are in the Western Division of the Capital league. Since moving to their present home, the club improved and expanded some of the facilities and it currently boasts a spectator capacity of 2640. For the purpose of this objection, it is worth noting that the site has an active use and that it is not just an open space; it has many buildings on it in constant use.



IEWS OF THE CURRENT WEALDSTONE FOOTBALL GROUND

THE OWNERSHIP OF THE LAND

7. As mentioned earlier the '*Khoja Shia Ithnaasheri Muslim Community of London*' (KSIMC) acquired the freehold interest on 21st December 2000 ostensibly for its future use by their own community. At the time of the purchase, the site was subject to a lease between the previous owner, the Secretary of State for Defence and the Ruislip Manor Sports and Social Club Limited. The duration of the lease, which is dated 11th July 2000, is from 25th December 2003 for a term of 15 years. This means that the lease will terminate on 25th December 2018.

8. In the context of the ownership of the site, it is worth discussing what KSIMC is and what are their aims. It has 10 centres in the UK with a community numbering over 10,000 and 5-6,000 of whom reside in the London area and nearly 80% of them live within ten mile radius of their existing main centre in Springbok House, Wood Lane, Stanmore, Middlesex. It is interesting to also note that nearly 35% of the members are young people (up to 18 years of age). The organisation is a UK registered charity, established in 1983 with the aim of promoting and advancing the Islamic religion in accordance with the principles of the Shia Ithna-asheri Sharia and to provide for the relief of poverty amongst Muslims of the Ithna-asheri faith. In accordance with this objective, the charity uses the Islamic Centre in Stanmore to cater for religious, educational and social needs of its members, as well as to bridge relationships with local residents, councils, politicians and members of other faiths so as to develop a better understanding between different and diverse religious and cultural organisations and communities.

9. The Charity is funded by annual contributions and voluntary donations and the organisation has grown from 500 at its inception to 6,000 in London alone. The other 9 centres located throughout the UK have also experienced remarkable growth in their membership. Thus, this rapid expansion of the community prompted an interest in planning for the future, resulting in the acquisition of the Ruislip Manor Sports and Social Club (the subject site) with the intention of utilising its facilities on the expiry of the lease. Therefore, the current use of the land will need to be viewed differently in planning terms in order to accommodate the social and recreational activities of this community.

10. The foregoing needs to be viewed in the context of the variety of sports and other social needs of the members of this Community. They currently provide for their members recreational needs by hiring local facilities and the prevailing demands have thus far outweighed the ability of the organisation to provide for the requisite sporting facilities. These range from football (both gender teams as well as 5 or 7 a-side), cricket, golf, tennis, yoga, volleyball, badminton, basketball, netball, table tennis, squash etc. Due to the increasing costs of hiring other venues, it has become the aspiration of the community that when the grounds revert to them, to adapt the existing facilities on the Ruislip site when it reverts to their ownership. The site's designation as part of the proposed Green Chain will, no doubt, wreck the community's ambitious plans for adaption and diversification of its facilities.

11. The discussion of the ownership in the preceding paragraphs provided the insight in the future use of the site but it must be stressed that the land in its totality is in **private ownership**. In this case, KSIMC could in the future use it exclusively for their members' recreational needs (the same as Wealdstone Football Club) and that other users would be treated as trespassers or have to pay for the spectator sports provided. **Therefore, the proposed Green Chain will not provide a suitable link with other green areas, as its accessibility to the public at large is outside the control of the London Borough of Hillingdon.**

ABOUT THE GREEN CHAIN

12. Strategic Guidance For London Planning Authorities as enshrined in RPG 3 - 1996 (now defunct) mooted, for the first time, the idea of the Green Chain designation. Under the heading of Green Chains and Walking Routes, it stated:

"Green chains comprise a series of elongated undeveloped green spaces linking broader areas of open land. The pattern of open land, which results helps to define parts of London, especially where the chains follow topographic features such as hills and river valleys. They may provide walking or cycling routes and permit relief from the effects of traffic. Where these chains and their associated open spaces are of more than individual borough significance they should be designated MOL. Green chains might also serve as wildlife corridors which provide a network of open spaces enhancing local ecological diversity."

13. The London Borough of Hillingdon, on the other hand, recommended in a Cabinet Member Report discussing, again, for the first time, '*Metropolitan Open Land and Green Chains Assessment*' in September 2003, the following:

- "1. That the Cabinet member note the findings of the *Metropolitan Open Land and Green Chains Assessment Project*.
2. That the cabinet Member request officers to take forward the findings of the *Metropolitan Open Land and green Chains Assessment Project* into the *Unitary Development Plan Review* for future consultation."

14. As a result of the foregoing Cabinet Member recommendation, the '*Green Chain Designation*' was incorporated in the London Borough of Hillingdon UDP Saved Policies September 2007. Under the heading of "Green Chains" in paragraph 3.22, the published document stated:

"Elsewhere in the Borough, the Yeading Valley Park Corridor, the open land adjoining Ickenham and Ruislip, and even narrow strips of open land such as the River Pinn Corridor and the Grand Union Canal, all link together to form 'Green Chains' of open land which extend across the Borough boundaries, providing wildlife corridors and countryside leisure opportunities for the urban dweller. The valuable role of such Green Chains in the urban environment is recognised in Strategic Planning Guidance (SPG, para 63). much of the land within Green Chains is already designated Green Belt or Metropolitan Open Land; areas not so designated but which nevertheless contribute to the Chains are also defined on the Proposals. Where appropriate, the Local Planning Authority will seek improved public access and landscape improvements to land included within the Green Chains and in consultation with adjacent Boroughs will seek to identify long distance footpaths which contribute to a network of metropolitan walks extending across London."

It is noteworthy that Table 3.4 Green Chains did not include the subject site and the Proposals Map left it undesignated.

15. It is also worth mentioning that the UDP Saved Policies included Policy OL11 in respect of "Green Chains" and it stated that the LPA will:

- "(i) Encourage the provision and improvement of suitable recreational activities*
- (ii) Maintain their positive contribution in providing a visual and physical break in the built-up area;*
- (iii) Conserve and enhance the visual amenity and nature conservation value of the landscape;*
- (iv) Seek to improve public access to and through the area; and*
- (v) Promote an overall identity for green chains throughout the borough.*

The subject sports ground can, thus, be safeguarded without imposing the proposed designation. All of the above can be achieved under current policies and under the auspices of the policies and guidelines of Sport England.

16. The next benchmark in the planning history of the Green Chain, as it applies to the subject site is the London Borough of Hillingdon Local Plan Part 2, which is the subject of this objection. This document proposes the designation of land known as "Ruislip Manor Sports Ground at Grosvenor Vale, Ruislip, HA4 6JQ" as part of the 'Green Chain' in Location Map No. 16 - "Ruislip Green Chain Link". The irony is that, when looking at the map, the subject site appears very isolated and has no link whatsoever to any other green area.

17. All of the areas were defined in the proposed changes to the UDP Proposals Map as '*Areas Forming Links in Green Chain (Green Chain Links)*'. The Green Chain has sometimes been compared to a mosaic or patchwork quilt because within it there are such a variety of open spaces whose locations are more suitable for linkage with other similar patches of land. It is contended that the subject sports ground, by virtue of its secluded position and surrounded by houses on all sides, could not possibly be part of the designated chain. There is no possible way of linking it with other open lands within Ruislip Manor.

18. Under the heading of '*Green Chain Assessment*', the Local Plan alleges that this site meets the criteria for Green Chains. The Plan cites the following reasons for its designation:

- "a Land in public or private ownership, in use or previously in use for open land recreational purposes**
- b. Land recognized as having potential for open land recreational use**
- c. Land that forms part of a link in a chain of open areas**
- d. Land of actual or potential landscape value**
- f. Land that links Green Belt or Metropolitan Open Land**

THE OBJECTION

19. Based on the above five criteria the Local Plan concluded that the proposed designations are consistent with the current policy. The conclusion is somewhat spurious and the reasoning is unsafe, when considered in the context of the location and the current use of the site. Hereunder, is the case for the objection by direct reference to the above listed criteria:

a. Land in public or private ownership, in use or previously in use for open land recreational purposes

The subject land is of an area of twelve acres and it is in private use as a football pitch for a non-league club, as well as a sports ground and playing fields. The ground has a capacity of 2640 spectators; nearly half are either seated or covered by stands. Associated with the present use is a successful social club housed in a commodious building, playing host to a wide range of activities on a regular basis, providing a venue for live music, dance lessons, drama, aerobics, archery and, of course, football. There is a function hall with a capacity for holding various events for up to 300 people. Additionally there are three bars and a TV lounge.

There are two aspects to the proposed designation, which need to be highlighted. Firstly, the designation of the site as part of the Green Chain will place an unnecessary constraint on the aspirations of current and future owners and users of the sports ground, and their desire for expansion and constant improvements. The designation will virtually afford the site a similar status as Green Belt land or a Metropolitan Open Space, and in the process would place a significant constraint on the future use of the site for recreation and sports activities.

Sport England:

Moreover, there is no need for such a designation, because the present use is regulated and in the process, is well safeguarded by the prevalent policies and guidelines of Sport England, who will vigorously resist any loss to the use of the site as playing fields or as sports ground. Since 1996, Sport England has been a statutory consultee on all planning applications for development affecting playing field land. This means that all local planning authorities must consult with Sport England when an application affect a sport-field, and their comments must be taken into account prior to its determination by the local authority. This requirement is enshrined in the Government Statutory Instrument 2010/2184 and their Planning Practice Guidance.

Sport England's blanket policy to oppose any development, which will result in the loss of playing field, provides a forceful safeguard against the loss of sports grounds, that is unless it is satisfied that the application meets with one or more of five exceptions - which are incorporated within paragraph 74 of the Government's National Planning Policy Framework (NPPF). Sport England's Playing Field Policy is normally invoked only in case where a planning application involves any loss to playing fields. The policy is as follows:

"Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgment of Sport England, one of the specific circumstances applies"

The National Planning Policy Framework

The NPPF offers a fair and robust policy to safeguard the current use of the site; to this end, paragraph 74 states:

"Existing open space, sports and recreational buildings and land, including playing fields should not be built upon unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

b. Land recognized as having potential for open land recreational use

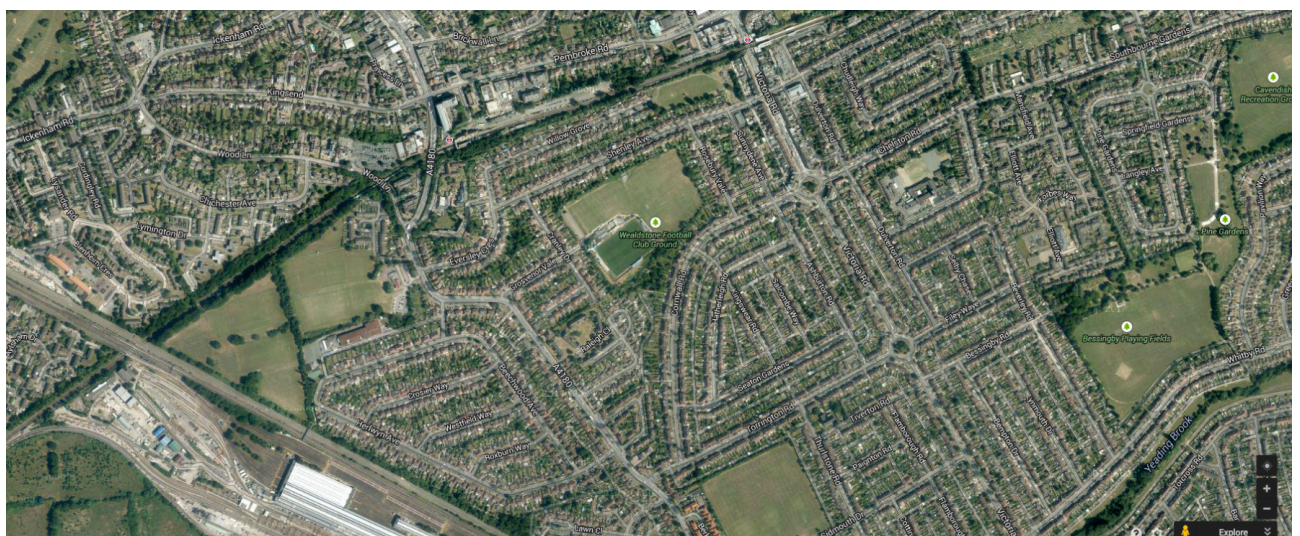
Since the building of the housing estate in the 1930s, the site has been a playing field. Initially it was used by the RAF and consequently by the Ruislip Manor and Wealdstone's Youth Team. A major remodeling and renovation scheme was sponsored by the supporters of the current club to improve the facilities, which have seen season-by season improvement resulting in a ground more than capable of hosting Conference South Football or FA Cup matches. Hence, whoever will ultimately be using the site, whether it is the landlord or the Wealdstone Football Club, there should remain room for improvement and possible expansion of the existing facilities. The designation will impose unnecessary limitations, which could thwart such aspirations for the site. Therefore, the site should be recognized as an operational playing field unencumbered as it has been for many decades. The planning process could under such circumstances regulate such intensification in order to safeguard the amenities of the neighbouring residents.

c. Land that forms part of a link in a chain of open areas

The land does not form part of a link in the chain of open areas. Only a glance at the whole of Ruislip Manor would reveal the isolated and exclusive nature of the subject sports ground. It is surrounded on four sides by housing and it is not possible to see how such an erroneous assumption was made which led to the conclusion that the site is capable of being linked to the 'chain of open areas'.



AN AERIAL VIEW SHOWING THE SITE CLEARLY SURROUNDED ON ALL SIDES BY THE 1930S HOUSING WITH NO POSSIBLE WAY TO LINK IT WITH THE CHAIN OF OPEN AREAS



WHERE IS THE LINKED CHAIN OF PLAYING FIELDS IN RELATION TO THE RUISLIP MANOR SPORTS AND SOCIAL CLUB SITE?

d. Land of actual or potential landscape value

f. Land that links Green Belt or Metropolitan Open Land

Criteria d and f are not applicable because they relate to lands with a potential landscape value or with links to Green Belt or Metropolitan Open Land respectively. The subject land is neither part of the designated Green Belt nor it is situated in a Metropolitan Open Land. In fact, it is as described earlier, a piece of land surrounded by residential with one access providing the only gap in the otherwise tightly knit houses.

CONCLUSION

20. The foregoing emphasizes the futility of the proposed designation of the site of the Ruislip Manor Sports and Social Club as part of the '*Green Chain Link*'. Such a designation renders the site a '*Green Belt or a Metropolitan Open Space*' land. It would thus impose limitations on the ability of the landlord or, at that, the football club's plans for improving the current facilities. In any case, in planning terms, there is no need for this designation because the use of the site is already regulated by the policies and standards of Sports England. These policies are robust enough to ensure safeguarding the current use without prejudicing the ability of the user to improve the facilities.

21. The London Plan promotes the principle of an inclusive society, whereby the needs of faith groups, are addressed through coordinated planning policies. How these needs should be met is a matter for local determination. It is clear in this case that the recreational needs of the 5,000 or more members of KSIMC should be addressed instead of being discouraged by unnecessarily including their playing fields in the proposed restrictive Green Chain Link.

22. It is also relevant to note that there are other sites that are more or equally suited for the '*Green Chain*' in Ruislip Manor and elsewhere, which have not been designated as a link in the proposed 'Chain', for example:

To the north:

- (1) Warrender Park
- (2) Land straddling the main railway line, south of Pembroke Road and the recreation ground off Shenley Avenue

To the south

- (3) Bessingby Playing Fields,
- (4) Field End School and allotment gardens.
- (5) Field End Road Recreation Ground
- (6) Area to the rear Brackenbridge Drive
- (7) Deane Park
- (8) Recreation Ground - north of the Long Drive
- (9) Playing fields south of Long Drive
- (10) School playing fields - Stafford Road

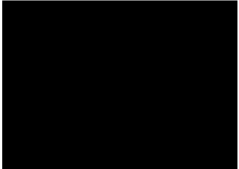
APPENDIX 1: Location of areas excluded from Green Chain (Local Plan Proposals Map)

23. Finally, the Ruislip Manor Sports and Social Club site is a land virtually surrounded on four sides by houses and as such it is impossible to see how it could form part of the notional Green Chain. There are other sites as highlighted in the preceding paragraph, which could make more suitable links in the proposed chain. It is, therefore, contended that the objection is inevitably sustainable, and as such the subject site should be excluded from the proposed '*Green Chain*'. Hence, the inspector is respectfully requested to uphold the objection so that the status of the site remains unaltered.

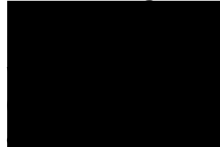
Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Nothing selected
First name	
Last name	
Address	Husaini Shia Islamic Centre 
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Khoja Shia Ithna-Asheri Muslim Community of London (KSIMC)

Agent's name and address (if applicable)

Title	Mr
First name	A Sahib
Last name	Kassim MSc FRTPi
Address	ASK Planning 
Postcode	
Telephone, including area code	
Email	
Company	ASK Planning

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	
Paragraph number	Site Allocations and Designations Paragraph 5.10 New Green Chain designation 16 Ruislip Green Chain Link
Table or figure number	
Map number (Atlas of Changes)	Policies Map Proposed Submission Version

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been

prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To elaborate the main issues raised in the written representation and in order to cross-examine the LPA and be cross-examined by the Inspector.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Ruislip Manor KSIMC Representation Nov14.pdf
Ruislip Manor Representation Appendix 1 Proposed Local Plan Map-Ruislip Marked up.pdf

Part C - Information on the progress of the Local Plan Part 2

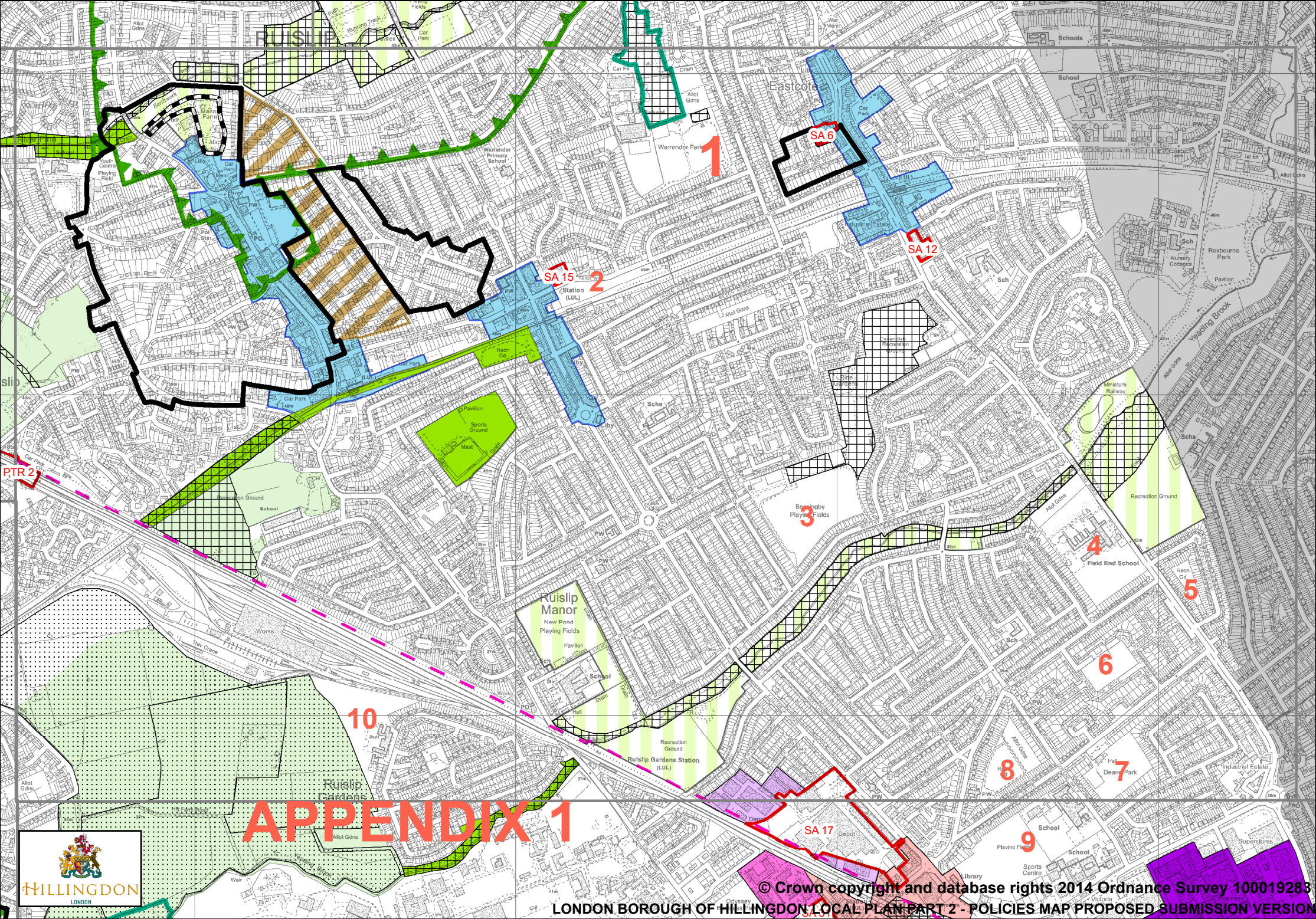
Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring





APPENDIX 1





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	East and North Hertfordshire NHS Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	4.3
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust ("ENHT"). ENHT is responsible for delivering acute healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including the specialist cancer services at the Mount Vernon Hospital.

Paragraph 4.3 states that the Local Plan Part 2 – Site Allocations and Designations document identifies specific sites for residential development to provide 5 years' worth of housing supply.

This statement is inaccurate and misleading. Furthermore, it is not consistent with the NPPF, the development plan for Hillingdon (the London Plan and the Local Plan Part 1), Paragraphs 3.1 to 3.9 of the Site Allocations and Designations document and the emerging Draft Further Alterations to the London Plan (January 2014), which is likely to become part of the development plan for Hillingdon before the Local Plan Part 2 is adopted.

In this regard, it should be noted that the Draft Further Alterations to the London Plan (January 2014) have been submitted to the Secretary of State and are currently the subject of Public Examination. The submitted Further Alterations to the London Plan include revised housing provisions which increase the minimum targets for the Boroughs and roll these forward to cover the period 2015 to 2025. In Hillingdon 's case, the proposed increase in the minimum annual average housing target is from 425 to 559 dwellings per annum over the period 2015 to 2025, rolled forward to the end of the Local Plan period, ie. 2026.

On this basis, if the submitted Draft Further Alterations to the London Plan are adopted as currently proposed, the minimum housing target for the period of the Hillingdon Local Plan 2011-2026 will be modified as follows:

- i) 425 dwellings per annum over the period 2011-2015 (4 years) = 1,700 dwellings
- ii) 5 dwellings per annum over the period 2015-2026 (11 years) = 6,149 dwellings

iii) Total for the plan period 2011-2026 (15 years) = 7,849 dwellings

As stated above, the Draft Further Alterations to the London Plan are at a more advanced stage than the Hillingdon Local Plan Part 2 and are likely to be adopted to form part of the up to date development plan for Hillingdon before the adoption of the Local Plan Part 2.

If this is the case, in accordance with Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the NPPF, it will be necessary to make changes to the Hillingdon Local Plan Part 2, including changes to Paragraphs 3.1 and 3.2, to ensure that it is consistent with the up to date development plan. For the same reasons, it will also be necessary to undertake a partial review of the Local Plan Part 1, including changes to Policy H1 and the explanatory text.

Please continue on a separate sheet if necessary

In addition, Paragraph 3.2 states that the Site Allocations and Designations document identifies specific sites to meet housing delivery targets in the short term (2011-2016) and medium term (2016-2021), whilst broad locations for residential development in the last 5 years of the plan are identified. However, whilst this approach to phasing the delivery of new dwellings appears to be consistent with the advice set out in Paragraph 47 of the NPPF, we do not believe this to be the case.

In summary, Paragraph 47 requires LPA's to ensure that their Local Plan meets the housing needs of the area, identify and update annually a supply of specific deliverable sites to provide 5 years worth of housing, and to identify a supply of specific, developable sites for years 6-10 and, where possible, for years 11-15.

On the basis that the 5 year housing land supply is required to be updated annually, ie. rolled forward, it is logical that the same should be done for the supply of sites for years 6-10 and, where possible, for years 11-15. If this is not the case, then a situation would arise where, on the first anniversary of the Local Plan, the LPA could only need to identify specific developable sites for years 7-10 and so on, until the point is reached on the 5th anniversary of the plan that the LPA is not required to identify any sites or broad locations to meet medium term housing land supply. Clearly, this cannot be the intention of Paragraph 47.

Therefore, in order to be consistent with Paragraph 47, we suggest that Paragraph 3.2 of the Local Plan Part 2 is amended to make it clear that the Site Allocations and Designation document identifies housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption.

If it is assumed that the Local Plan Part 2 is adopted in 2015, this will mean that the provisions of the Site Allocations and Designations document relating to the phasing of housing delivery will need to be rolled forward to identify sites to meet the housing targets for the short term (2015-2020) and medium term (2020-2025). Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 will need to be amended accordingly, to set out clearly the housing supply position at the date of Local Plan Part 2 adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In order for the Local Plan Part 2 to be found sound there are a number of necessary changes.

The suggested changes are set out in our main representations set out in question 5 see above.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The housing provision of the Local Plan Part 2 are fundamental to its soundness and the Trust wishes to ensure that necessary and appropriate changes are made.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

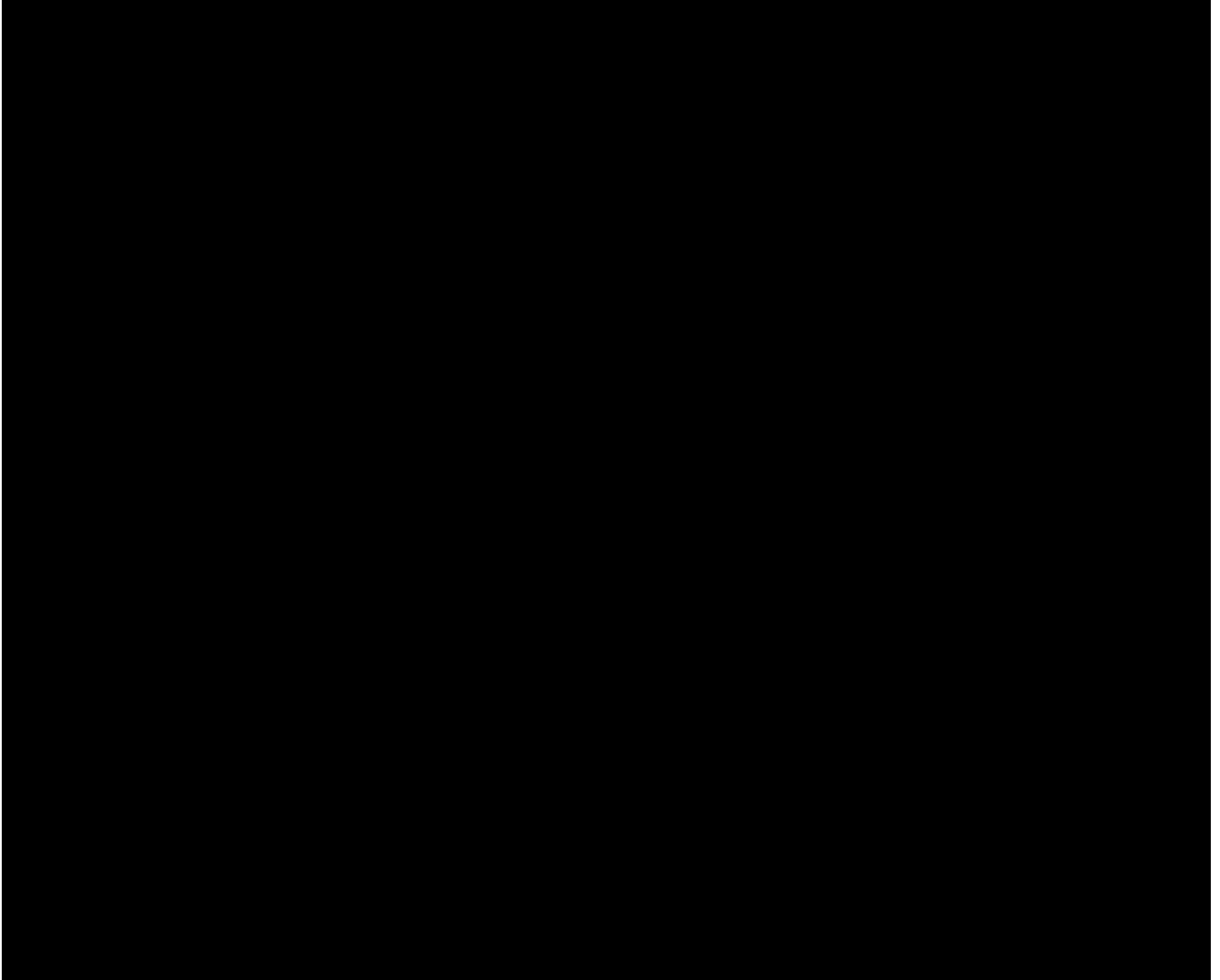
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





HILLINGDON

LONDON

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	East and North Hertfordshire NHS Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	6.16
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust ("ENHT"). ENHT is responsible for delivering healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including specialist cancer services at the Mount Vernon Hospital Site.

The NPPF in paragraph 182 states that in order for a Local Plan to be found sound it needs to be consistent with national policy and should enable delivery of sustainable development in accordance with the policies in the Framework.

Paragraph 6.16 of the Local Plan Part 2: Development Management Policies states "Dwellings are inappropriate development in the Green Belt and Metropolitan Open Land but where they exist, alterations and extensions will be acceptable, provided they do not result in disproportionate additions over and above the size of the original buildings".

However Paragraph 89 of the NPPF confirms that although a local planning authority should regard the construction of new buildings as inappropriate in Green Belt, there are a number of specific exceptions to this, including the following:

" limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development."

It should be noted that this specific exception is silent as to the proposed use of the site following infilling or its partial or complete redevelopment and so does not preclude the possibility of dwellings or residential developments being considered appropriate development in accordance with Paragraph 89. This is clearly the case, since where Paragraph 89 does not intend for dwellings or residential development to qualify as an exception, it clearly states so (see for example, the exception relating to the replacement of a building).

For this reason it is concluded that Paragraph 6.16 as currently drafted does not comply with the NPPF and is therefore unsound.

Furthermore, we note that the exceptions set out in paragraph 89 are reproduced in paragraph 6.14 of the Local Plan Part 2 and so paragraph 6.14 and 6.16 are not consistent with one another.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

In order for the Local Plan Part 2 to be found sound in line with the NPPF we propose the following changes to paragraph 6.16:

"New dwellings are inappropriate development in the Green Belt and Metropolitan Open Land unless they qualify as one of the exceptions outlined in paragraph 89 of the NPPF. Where dwellings already exist, alterations and extensions will be acceptable, provided they do not result in disproportionate additions over and above the size of the original building."

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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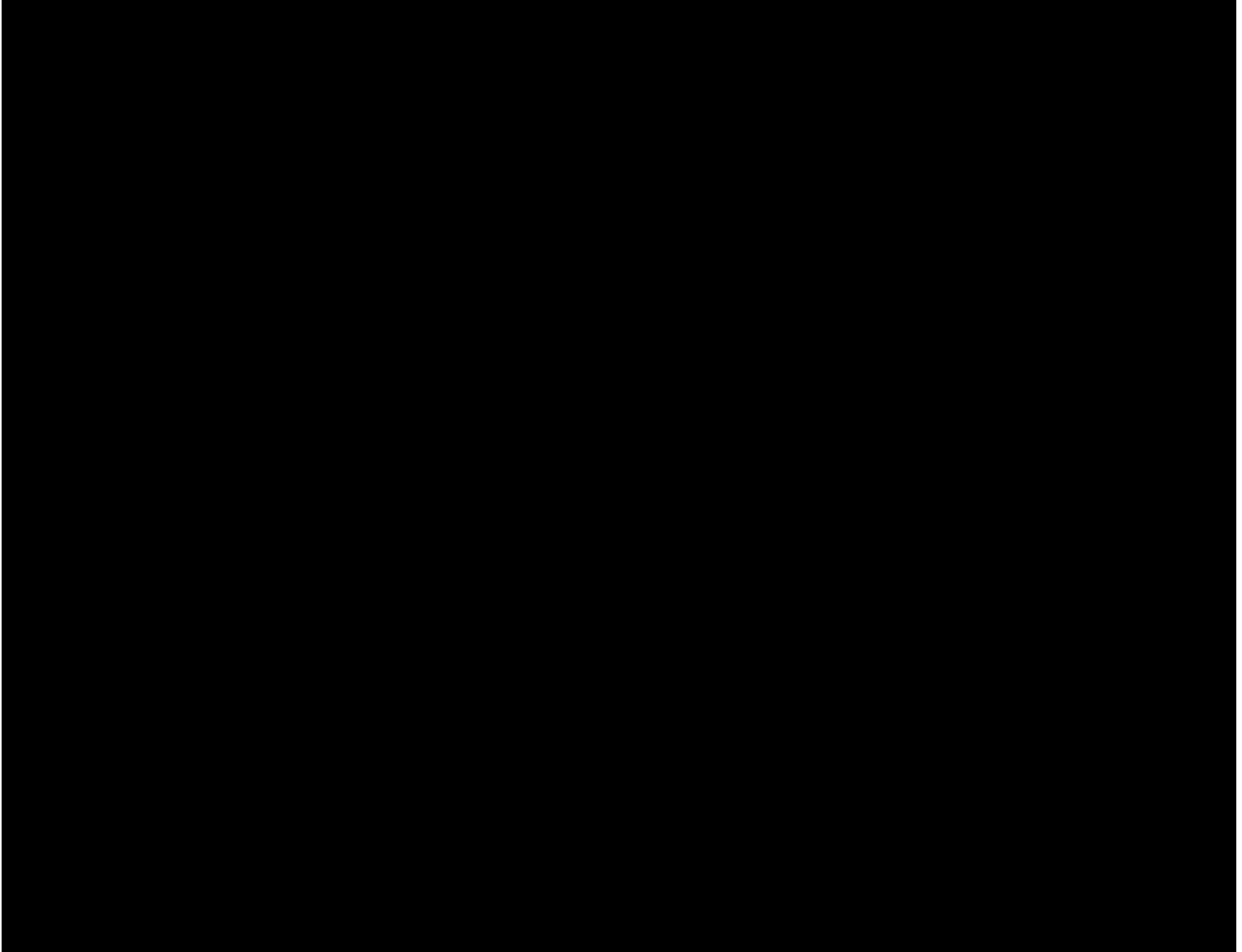
- **Email to:** localplan@hillingdon.gov.uk
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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	East and North Hertfordshire NHS Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Lance		
Last name	Flannigan		
Company	Nexus Planning		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
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<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraphs 3.1 and 3.2
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
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These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust ("ENHT"). ENHT is responsible for delivering healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including specialist cancer services at the Mount Vernon Hospital Site.

Paragraphs 3.1 and 3.2 of the Site Allocations and Designations document have been drafted to accord with the development plan for Hillingdon and, as a result, state that the identification of sites for new homes has been undertaken in the context of Policy H1 of the Local Plan Part 1. In turn, Policy H1 provides for a minimum of 6,375 new dwellings to be delivered over the period of the Hillingdon Local Plan (2011/2026) and for sites that contribute to the achievement of this target to be identified in the Hillingdon Local Plan Part 2 – Site Specific Allocations LDD.

In turn, Policy H1 of the Local Plan Part 1 has been based upon the housing provisions of the London Plan (2011) which at Policy 3.3 states that housing delivery should meet or exceed the minimum annual average housing target for each Borough. In Hillingdon 's case, the target is 425 new dwellings per annum, which over the 10 year period of the London Plan (2011-2021) equates to a minimum target of 4,250 new dwellings. Policy 3.3 goes on to state that, where a target beyond 2021 is required, the average annual target should be rolled forward to cover the period of the Local Plan until it is replaced by a revised London Plan target.

In this regard, it should be noted that the Draft Further Alterations to the London Plan (January 2014) have been submitted to the Secretary of State and are currently the subject of Public Examination. The submitted Further Alterations to the London Plan include revised housing provisions which increase the minimum targets for the Boroughs and roll these forward to cover the period 2015 to 2025. In Hillingdon 's case, the proposed increase in the minimum annual average housing target is from 425 to 559 dwellings per annum over the period 2015 to 2025, rolled forward to the end of the Local Plan period, ie. 2026.

On this basis, if the submitted Draft Further Alterations to the London Plan are adopted as currently proposed, the minimum housing target for the period of the Hillingdon Local Plan 2011-2026 will be modified as follows:

- i) 425 dwellings per annum over the period 2011-2015 (4 years) = 1,700 dwellings
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iii) Total for the plan period 2011-2026 (15 years) = 7,849 dwellings

Please continue on a separate sheet if necessary

As stated above, the Draft Further Alterations to the London Plan are at a more advanced stage than the Hillingdon Local Plan Part 2 and are likely to be adopted to form part of the up to date development plan for Hillingdon before the adoption of the Local Plan Part 2.

If this is the case, in accordance with Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the NPPF, it will be necessary to make changes to the Hillingdon Local Plan Part 2, including changes to Paragraphs 3.1 and 3.2, to ensure that it is consistent with the up to date development plan. For the same reasons, it will also be necessary to undertake a partial review of the Local Plan Part 1, including changes to Policy H1 and the explanatory text.

In addition, Paragraph 3.2 states that the Site Allocations and Designations document identifies specific sites to meet housing delivery targets in the short term (2011-2016) and medium term (2016-2021), whilst broad locations for residential development in the last 5 years of the plan are identified. However, whilst this approach to phasing the delivery of new dwellings appears to be consistent with the advice set out in Paragraph 47 of the NPPF, we do not believe this to be the case.

In summary, Paragraph 47 requires LPA's to ensure that their Local Plan meets the housing needs of the area, identify and update annually a supply of specific deliverable sites to provide 5 years worth of housing, and to identify a supply of specific, developable sites for years 6-10 and, where possible, for years 11-15.

On the basis that the 5 year housing land supply is required to be updated annually, ie. rolled forward, it is logical that the same should be done for the supply of sites for years 6-10 and, where possible, for years 11-15. If this is not the case, then a situation would arise where, on the first anniversary of the Local Plan, the LPA could only need to identify specific developable sites for years 7-10 and so on, until the point is reached on the 5th anniversary of the plan that the LPA is not required to identify any sites or broad locations to meet medium term housing land supply. Clearly, this cannot be the intention of Paragraph 47.

Therefore, in order to be consistent with Paragraph 47, we suggest that Paragraph 3.2 of the Local Plan Part 2 is amended to make it clear that the Site Allocations and Designation document identifies housing sites to meet the housing delivery targets for the short term (years 1 to 5) and medium term (years 6-11), starting from the date of its adoption.

If it is assumed that the Local Plan Part 2 is adopted in 2015, this will mean that the provisions of the Site Allocations and Designations document relating to the phasing of housing delivery will need to be rolled forward to identify sites to meet the housing targets for the short term (2015-2020) and medium term (2020-2025). Paragraphs 3.4 to 3.9 and Tables 3.2 and 3.2 will need to be amended accordingly, to set out clearly the housing supply position at the date of Local Plan Part 2 adoption, by recording dwelling completions up to 2015 and re-phasing the anticipated delivery of identified housing sites in years 1 to 5 (2015-2020) and years 6 to 10 (2020-2025) accordingly.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The suggested changes considered necessary to make the Local Plan Part 2 sound are set out in our main representation set out in question 5 above.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The housing provision of the Local Plan Part 2 are fundamental to its soundness and the Trust wishes to ensure that necessary and appropriate changes are made.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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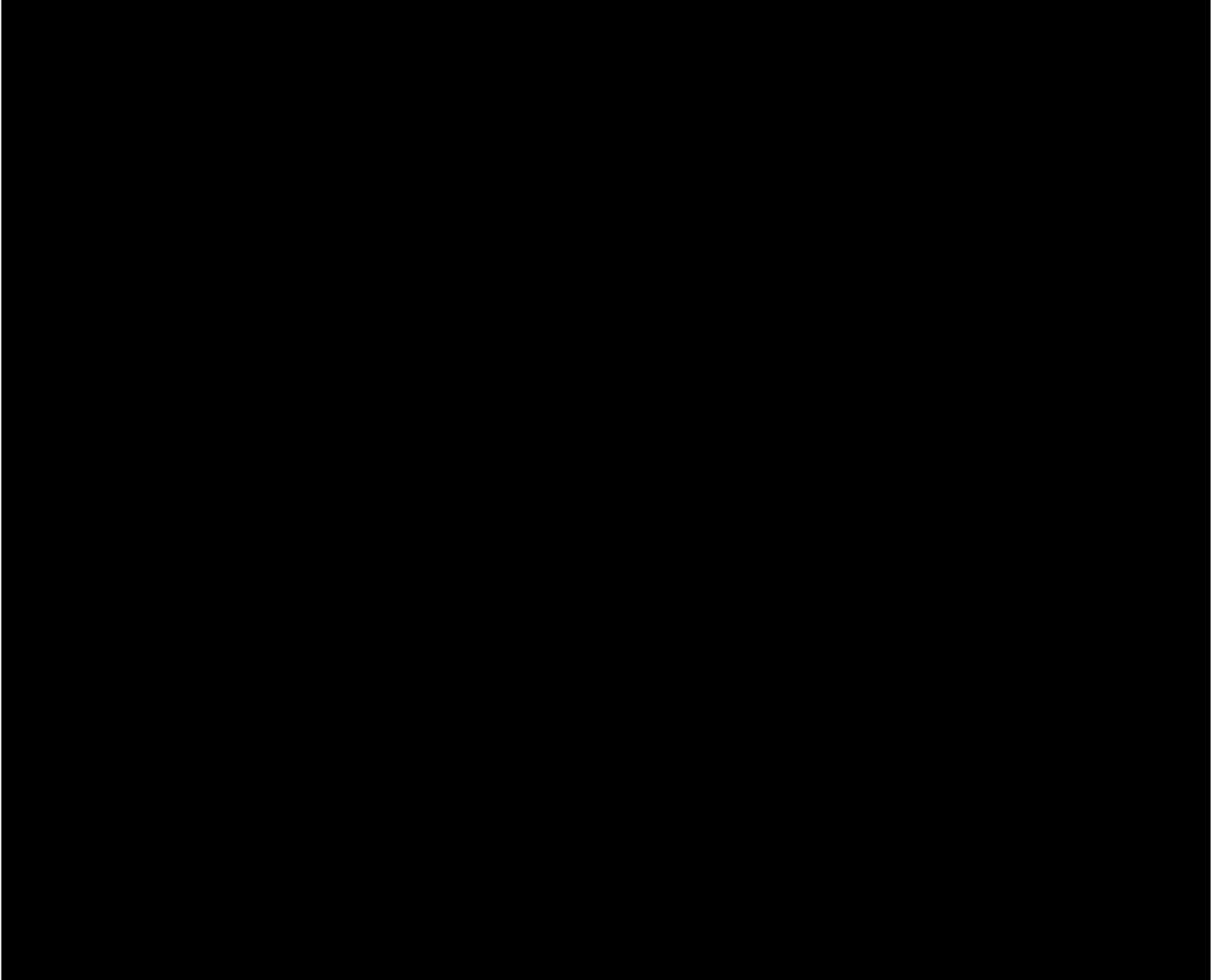
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	
First name	
Last Name	
Organisation (if relevant)	East and North Hertfordshire NHS Trust
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Lance
Last name	Flannigan
Company	Nexus Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 3.2
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust (" ENHT "). ENHT is responsible for delivering healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including at the Mount Vernon Hospital Site.

The Mount Vernon Hospital site provides a range of healthcare services including the Cancer Centre run by the Trust which provides well renowned, highly specialised cancer services. There have been a number of reviews regarding the location of the Cancer Centre in recent years and they have concluded that the services should continue from the site and ENHT is committed to continue with this much valued service on the site.

As a centre of excellence the Trust prides itself on new treatments, patient focused care and a well developed research team. The cancer services are provided for the local population and are valued highly by local people. The services also serve a much wider catchment area of almost 2 million people including Hertfordshire and Bedfordshire and some patients referred from elsewhere in the country. ENHT employs over 500 members of staff at the Mount Vernon Hospital Site.

Hillingdon Hospital NHS Foundation Trust (THH) whom own the Site and lease a number of health care facilities run by private and charitable operators including the Michael Sobbell House Hospice, Paul Strickland Scanner Centre and Baxters Healthcare. Many of the buildings are also associated with cancer treatments. As a result the Mount Vernon Hospital site provides a range of health care services and has an important strategic role serving Hertfordshire and North West London.

A plan identifying the Mount Vernon Hospital Site and adjoining land owned by the Hillingdon Trust is attached in Appendix 1 of these representations.

To ensure that the aspirations of both ENHT and THH for future development at the Mount Vernon Hospital site can be delivered ENHT is seeking to secure a number of changes to the Hillingdon Local Plan part 2 in relation to the Mount Vernon Hospital site, to include:

- i. the removal of land from the Green Belt
- ii. the allocation of (part of the) land for housing
- iii. exclusion of land from the proposed extension of the Site of Grade 1 Nature Conservation Importance

In accordance with the NPPF, (i) above can only be achieved through the preparation or review of the local plan. The NPPF requires a demonstration of exceptional circumstances to justify such removal.

ENHT considers that exceptional circumstances exist in relation to the Mount Vernon Hospital site. Its case consists of a number of interrelated factors which in combination provide the necessary justification for removal of land from the Green Belt. Its exceptional circumstances case requires representations to be made in relation to different parts of the Hillingdon Local Plan part 2 (proposed submission version) and the representations set out below should be considered accordingly.

Please continue on a separate sheet if necessary

To assist in the achievement of the ENHT aspirations for future development at the Mount Vernon Hospital site and to provide the necessary certainty, the Trust proposes that land at the site is identified as a housing site in the Site Allocations and Designations document and is included in the list of allocated housing sites at Table 3.2 for delivery in the short term, ie. within 5 years following the date of adoption.

The extent of the site proposed to be allocated for new housing is shown coloured yellow on the plan at Appendix 2. The site area is 5.4ha hectares and based on a range of factors, including its location and accessibility, has the capacity to deliver sustainable development of approx 170 dwellings.

The planning justification for the proposed housing site allocation is as follows:

- i) It represents a key element of the Trust's proposals for the sustainable, healthcare led development of the Mount Vernon Hospital site for which there is a demonstrable need, which in turn can only be achieved by securing the site's release from the Green Belt.
- ii) The proposed housing development forms part of the exceptional circumstances case put forward by the Trust to secure the release of land at the Mount Vernon Hospital site from the Green Belt. In short, the Trust's plans for sustainable development on the site rely upon funding and the capital receipt from the proposed housing development represents a substantial part of this funding.
- iii) The proposed housing site is considered suitable and its development will contribute towards meeting and exceeding the minimum housing requirement for Hillingdon in accordance with the provisions of modified Policy 3.3 and the increased housing target for Hillingdon set out in the Draft Further Alternations to the London Plan (January 2014).
- iv) The proposed housing will be part of an integrated mixed use development which will make efficient and effective use of land which is already substantially developed but significantly under-utilised and will achieve significant net gains across the economic, social and environmental dimensions of sustainable development.
- v) With the exception of an area of approximately 5.4 hectares situated in the eastern part of the proposed housing site, all of the land included within the proposed housing site allocation is classified as previously developed land and its immediate curtilage.
- vi) The exceptions to inappropriate development in the Green Belt identified in paragraph 89 of the NPPF do not preclude the redevelopment of previously developed land for residential use.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In order for the Local Plan Part 2 to be Sound, the ENHT considers that it is necessary to allocate the land at the Mount Vernon Hospital Site identified on the map at Appendix 2 to these representations as a housing site for delivery in the first five years following the date of adoption.

To secure the allocation it will be necessary to include the site in the list of allocated housing sites at table 3.2 and a new site allocation policy for land at the Mount Vernon Hospital Site in the Site Allocations and Designations Document. It will also be necessary to identify the site on the Policies Map (Atlas of Changes) as a housing site.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The allocation of land at the Mount Vernon Hospital Site for housing is fundamental to the delivery of the Trust's plans for future development at the Site and improved healthcare provision to serve Hillingdon and the wider area.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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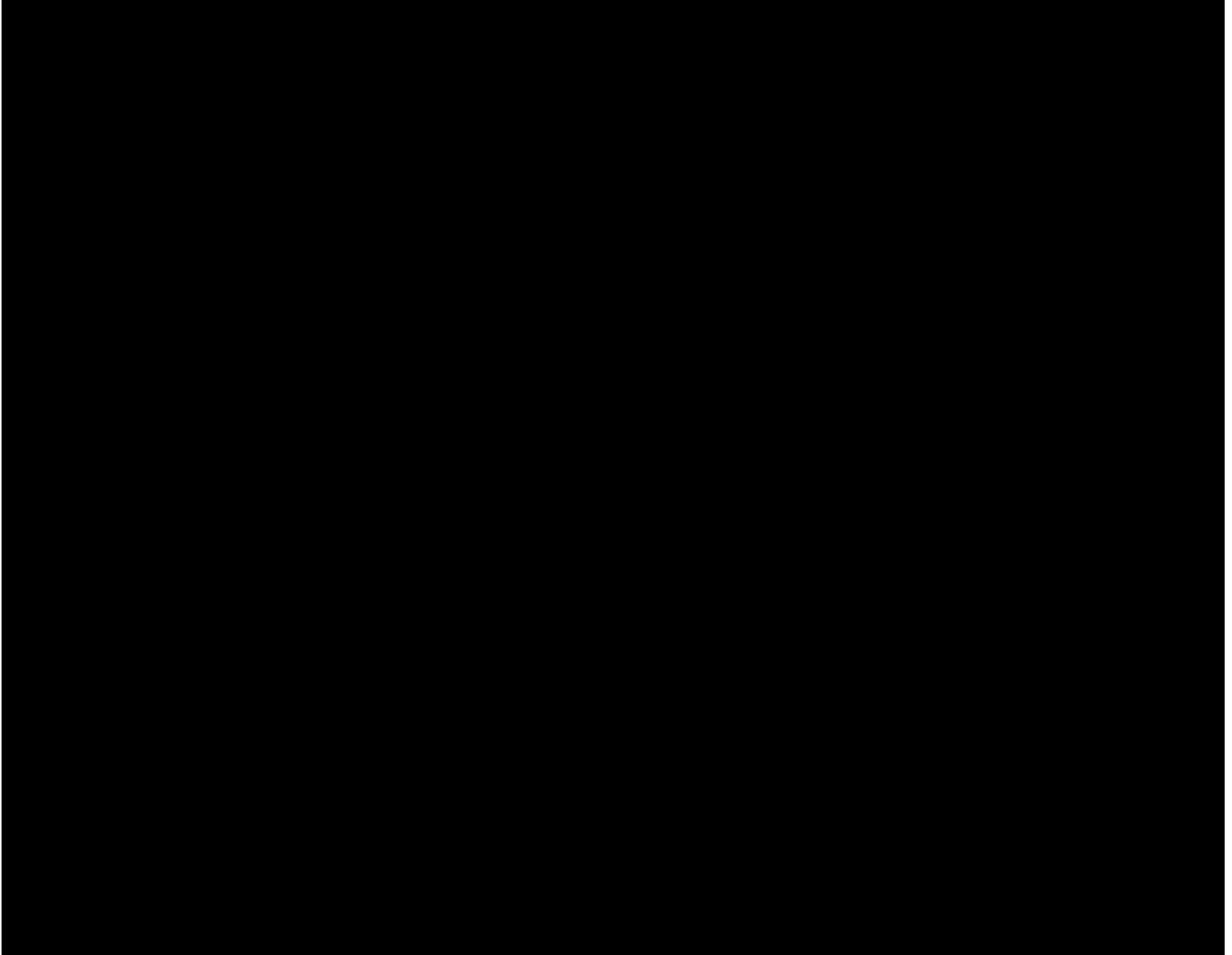
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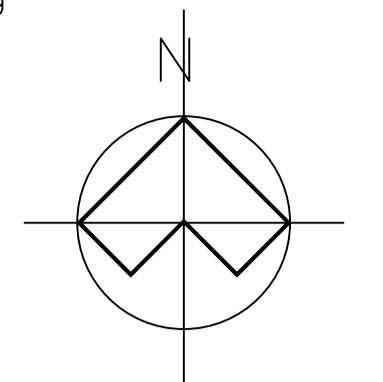
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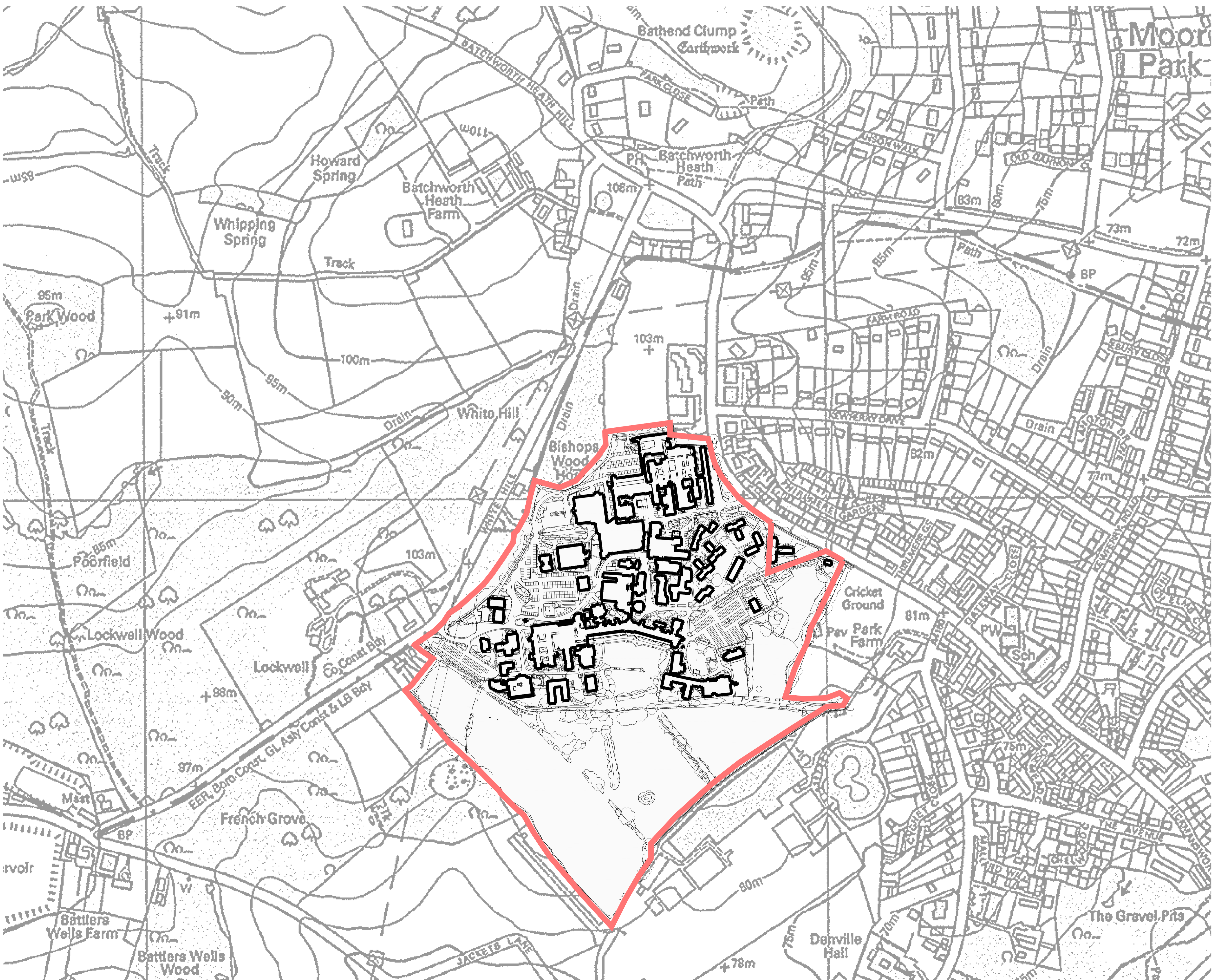



Appendix 1:
Site Location Plan

do not scale dimensions from this drawing



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 Land owned by The Hillingdon Hospital NHS FT

NOTE: boundaries shown are for general identification purposes only and must not be taken as defining legal title or ownership

BroadwayMalyan

3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

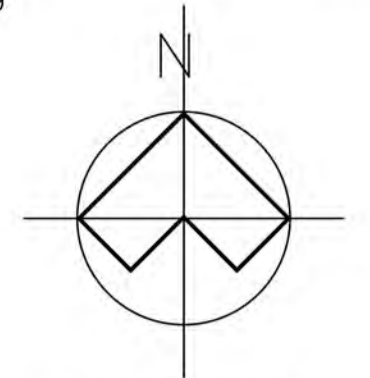
Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Location Plan

Status
FOR IDENTIFICATION ONLY

Scale	Drawn	Date
1:2500 @ A1	AH / OS	2014
Job number	Drawing number	Revision
23825	01 / 01	-

Appendix 2:
Zoning Diagram

do not scale dimensions from this drawing



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- Site boundary
- Listed buildings
- The Hillingdon Hospital NHS FT retained area
- East and North Herts NHS Trust retained area
- Surplus area - residential, Phase 1 disposal
- Phase 2 disposal

NOTE: boundaries shown are for general identification purposes only and must not be taken as definitive legal title or ownership

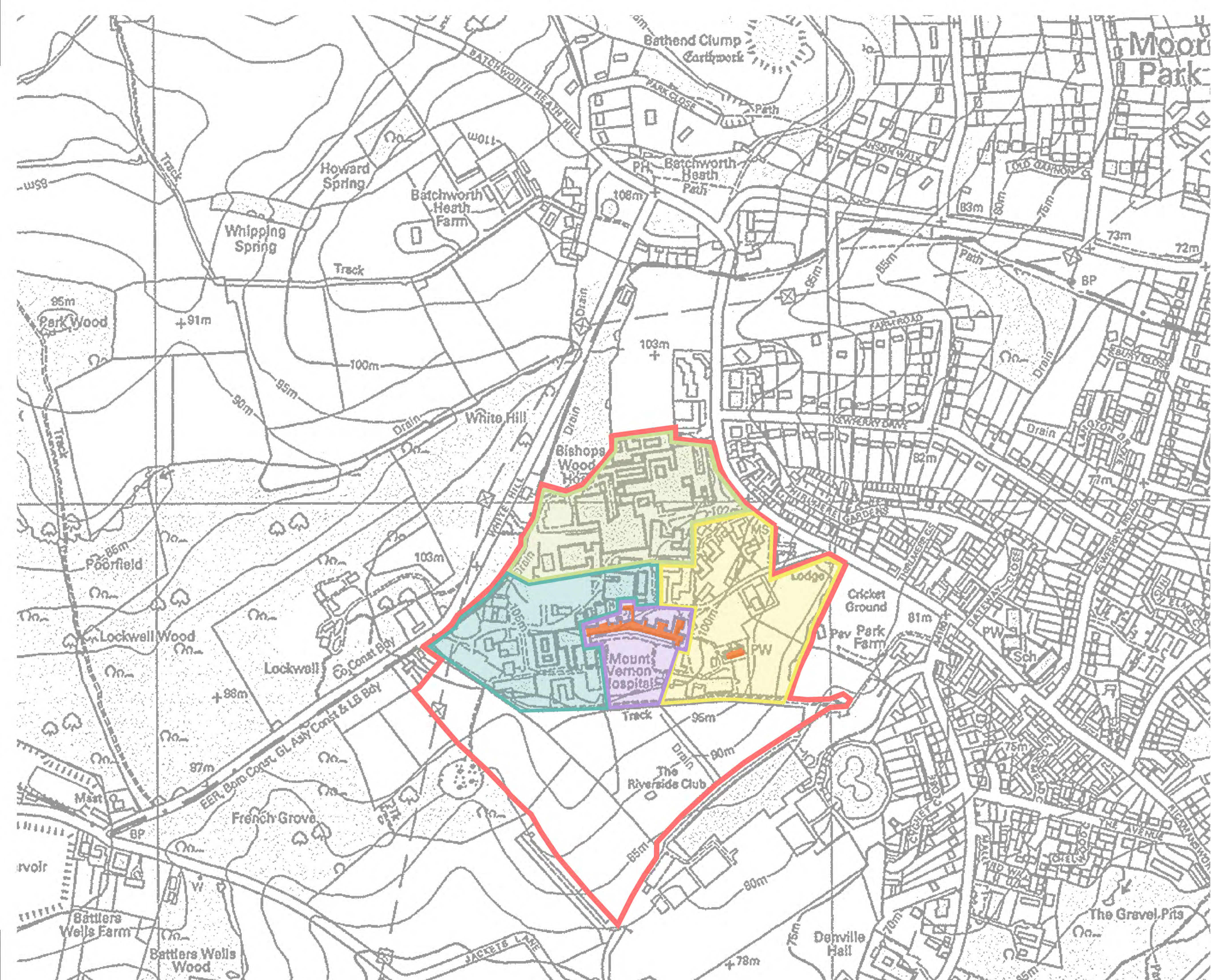
BroadwayMalyan
Planning

3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Preliminary Zoning Diagram

Status	FOR IDENTIFICATION ONLY		
Scale	Drawn	Date	
1:2500 @ A1	AH / OS	2014	
1:5000 @ A3	Job number	Drawing number	Revision
23825	01 / 03		

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HILLINGDON

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1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	East and North Hertfordshire NHS Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Lance
Last name	Flannigan
Company	Nexus Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraph 5.1- 5.10
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust ("ENHT"). ENHT is responsible for delivering healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including at the Mount Vernon Hospital Site.

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A plan identifying the Mount Vernon Hospital Site and adjoining land owned by the Hillingdon Trust is attached in Appendix 1 of these representations.

To ensure that ENHT aspirations of future development at the Mount Vernon Hospital site can be delivered ENHT is seeking to secure a number of changes to the Hillingdon Local Plan part 2 in relation to the Mount Vernon Hospital site, to include:

- i. the removal of land from the Green Belt
- ii. the allocation of (part of the) land for housing
- iii. exclusion of land from the proposed extension of the Site of Grade 1 Nature Conservation Importance

In accordance with the NPPF, (i) above can only be achieved through the preparation or review of the local plan. The NPPF requires a demonstration of exceptional circumstances to justify such removal.

The Trust considers that exceptional circumstances exist in relation to the Mount Vernon Hospital site. Its case consists of a number of interrelated factors which in combination provide the necessary justification for removal of land from the Green Belt. Its exceptional circumstances case requires representations to be made in relation to different parts of the Hillingdon Local Plan part 2 (proposed submission version) and the representations set out below should be considered accordingly.

Please continue on a separate sheet if necessary

The extent of the land proposed to be removed from the Green Belt is identified on the plan at Appendix 2 to these representations.

Fundamentally, the drawing up or review of Green Belt boundaries should take account of the need to promote sustainable patterns of development (Paragraph 84 of NPPF). In particular, Paragraph 85 of the NPPF confirms that the following considerations shall apply:

- i. Green Belts should not include land it is unnecessary to keep permanently open. Therefore, the removal of land from the Green Belt will be justified if it can be demonstrated / established that its removal will not result in a loss of openness which would cause material harm to the purposes of including the land within the Green Belt. Important parts of this overall consideration are whether, as a result of changes to the land since it was originally included in the Green Belt, it can still be considered open in character and the extent to which it can still be said to perform a Green Belt purpose as a result.
- ii. How and to what extent will the removal of land from the Green Belt contribute towards the achievement of sustainable development and will it be consistent with the Local Plan Strategy for meeting identified requirements for sustainable development? In particular, will it deliver net economic, social and environmental gains, which include, but are not confined to, meeting strategic and local needs for improved healthcare provision, new homes and jobs.
- iii. Local Planning Authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period and should define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The Trust considers that all of these considerations are met or satisfied by the proposed release of land at the Mount Vernon Hospital site and that this amounts to the exceptional circumstances necessary to justify the release. A more detailed description of the exceptional circumstances justifying release is set out below.

1. In accordance with paragraph 83 of the NPPF Policy EM2 of the Local Plan Part 1 makes specific provision for minor adjustment to the Green Belt to be made by the Local Plan Part 2- Site Specific Allocations LLD. Paragraph 8.24 of the Local Plan Part 1 also confirms that Policy EM2 provides for the Local Plan Part 2 to release land which no longer serves Green Belt purposes. Therefore in accordance with the NPPF an appropriate Local Plan policy context exists for land at the Mount Vernon Hospital Site to be released from the Green Belt, on the basis that it is not necessary to retain the land in the Green Belt. In this regard it should be noted that the Local Plan part 2 (submission version) proposes the deletion of the Former Perry Oaks Sludge Works Site, Heathrow from the Green Belt on this basis and so it is clear that Policy EM2 provides for adjustments to the Green Belt which are more than minor.
2. Paragraph 79 of the NPPF confirms that the essential characteristics of Green Belts are their openness and permanence. The extent to which any piece or parcel of land can be considered permanently open will be a matter of fact and degree in each case, and will depend primarily on the physical effect of built form upon the openness of the

land (ie. the extent to which it has “displaced” openness) and any changes in the relationship between built form and openness which have taken place over time. Any physical or actual loss of openness resulting from built form (buildings, structures and fixed surface infrastructure) can be objectively measured by reference to its extent / spread, footprint, floorspace, height and bulk, and in turn, this will have a significant bearing on any visual loss and the perception of openness.

3. Against this background, the land at the Mount Vernon Hospital site which the Trust proposes to be removed from the Green Belt has undergone significant development and change since its original designation as Green Belt in the 1950's. The land is now substantially and intensely developed with buildings, structures and hard surface infrastructure covering the vast proportion of the area and in many instances extending up to the boundaries of the land proposed for removal. It now exhibits a materially different character to that which existed at the time of its Green Belt designation, when a much greater proportion of the land was open and undeveloped, the density of development was much lower, with more substantial open areas in between, and much of the development comprised single storey ward accommodation. Therefore, at the time of Green Belt designation, the land exhibited some of the physical and visual characteristics of an institution in an open countryside setting. By contrast, the land is now dominated by built form and exhibits more of the characteristics of the adjoining urban area than it does of the Green Belt, which in the Trust's view, materially diminishes its contribution to the openness of the wider Green Belt and its ability to serve the purposes of designation.
4. Paragraph 80 of the NPPF confirms that Green Belts serve 5 purposes and in the Trust's view, the land proposed for release from the Green Belt makes only a limited contribution to these purposes for the following reasons:
 - i) on the basis that most of the land which is proposed to be deleted comprises previously developed land and its immediate curtilage, and is contiguous with and shares the same characteristics as the existing urban area, it does not perform any role in checking the unrestricted sprawl of large built up areas.
 - ii) for the same reason the previously developed land and its immediate curtilage does not perform any purpose in preventing neighbouring towns merging into one another, so restricting development upon it will not serve the purpose preventing neighbouring towns from merging.
 - iii) for the same reason, including the previously developed land and its immediate curtilage within the Green Belt does not assist in safe guarding the countryside from encroachment.
 - iv) the land to be deleted was not originally designated as Green Belt in order to preserve the setting and special character of historic towns and serves no purpose in this regard.
 - v) the retention of the land within the Green Belt will not assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Most of the land is previously developed and, in the Trust's view, forms part of the urban area.

Therefore its retention within the Green Belt will frustrate urban regeneration since it will prevent the Trust's plans to regenerate the land from being realised.

vi) in the Trust's opinion, the only part of the land which is proposed for removal from the Green Belt which currently serves a Green Belt purpose is a small area of open and undeveloped land lying west of and adjacent to Northwood Cricket Club.

However, the Trust considers that its contribution to Green Belt purposes is limited and that the harm caused to Green Belt purposes is outweighed by the benefits the sites regeneration resulting from its proposed removal from the Green Belt.

5. In addition to the scale and extent of built development currently on site, formal agreement was reached between the LPA and the Trust under Annex C of the former PPG3 in respect of recording the extent of previous development at the site in order that the buildings which had been removed may be re-provided in accordance with Annex C.
6. There is an acknowledged strategic and local need for improved and expanded healthcare provision to meet the future needs of the Communities served by the Trust and other occupiers of the site over the long term.
7. There is an acknowledged strategic and local need for improved and expanded residential accommodation for staff (Key workers), which cannot be met elsewhere.
8. There are significant operational health care and sustainability benefits of co-locating existing and new facilities at The Mount Vernon Hospital site as part of a mixed use scheme. Apart from the Hillingdon Hospital Site there are no suitable alternatives in the urban area and in ENHT view, further development at both sites is necessary to achieve improved healthcare provision in the area.
9. The exceptions to inappropriate development set out at Paragraph 89 of the NPPF are not sufficient to meet the strategic long term needs for future healthcare and associated development at the Mount Vernon Hospital site outlined above.
10. Release of the land from the Green Belt will allow for some limited housing development to take place which is essential to the financial viability and delivery of improved healthcare provision in the area. In turn, the housing will make a contribution to meeting and exceeding the increased minimum housing targets for Hillingdon in accordance with revised Policy 3.3 of the Draft Further Alternations of the London Plan (January 2014).
11. Making the best and most effective use of land to be removed from the Green Belt will result in net gains across the economic, social and environmental dimensions of sustainable development, including recreational, ecological and landscape enhancements to land retained within the Green Belt owned by the Trust.
12. Whilst providing for the long term needs of ENHT for sustainable development, the reviewed boundaries will last beyond the plan period and are likely to be permanent. The revised Green Belt boundaries are clearly defined, using physical features that are readily recognisable, and they have been selected to ensure that no more land is removed from the Green Belt than is necessary. The revised Green Belt boundary shown on the plan at Appendix 2 follows NPPF guidance and in doing so will result in

the release of no more land from the Green Belt than is necessary to deliver the ENHT plans for necessary and sustainable development.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

For the Local Plan Part 2 to be sound, ENHT considers it necessary to amend paragraph 5.5 to 5.7, the list of proposals on Page 103 and the subsequent details of Green Belt Allocations set out on page 104 to 107 of the Site Allocations and Designations document to confirm the removal of the land at the Mount Vernon Hospital Site, identified on the plan at Appendix 2 to these representations, from the Green Belt.

It will also be necessary to amend the Policies Map (Atlas of Changes) to reflect these changes.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

The proposed removal of Land at the Mount Vernon Hospital Site is fundamental to the delivery of ENHT plans for future development at the site and improved healthcare provision to serve Hillingdon and the wider area.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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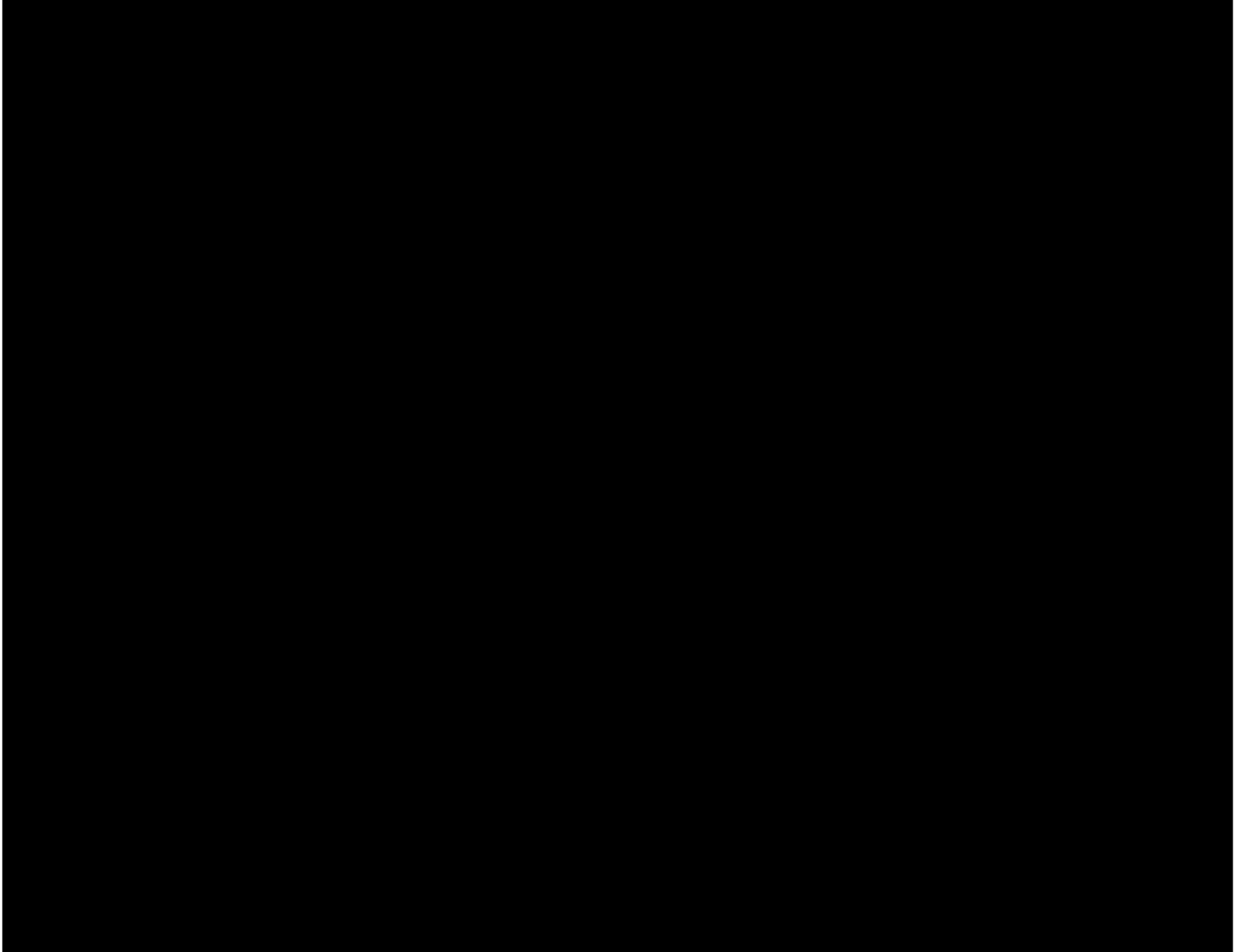
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- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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Monitoring Questions

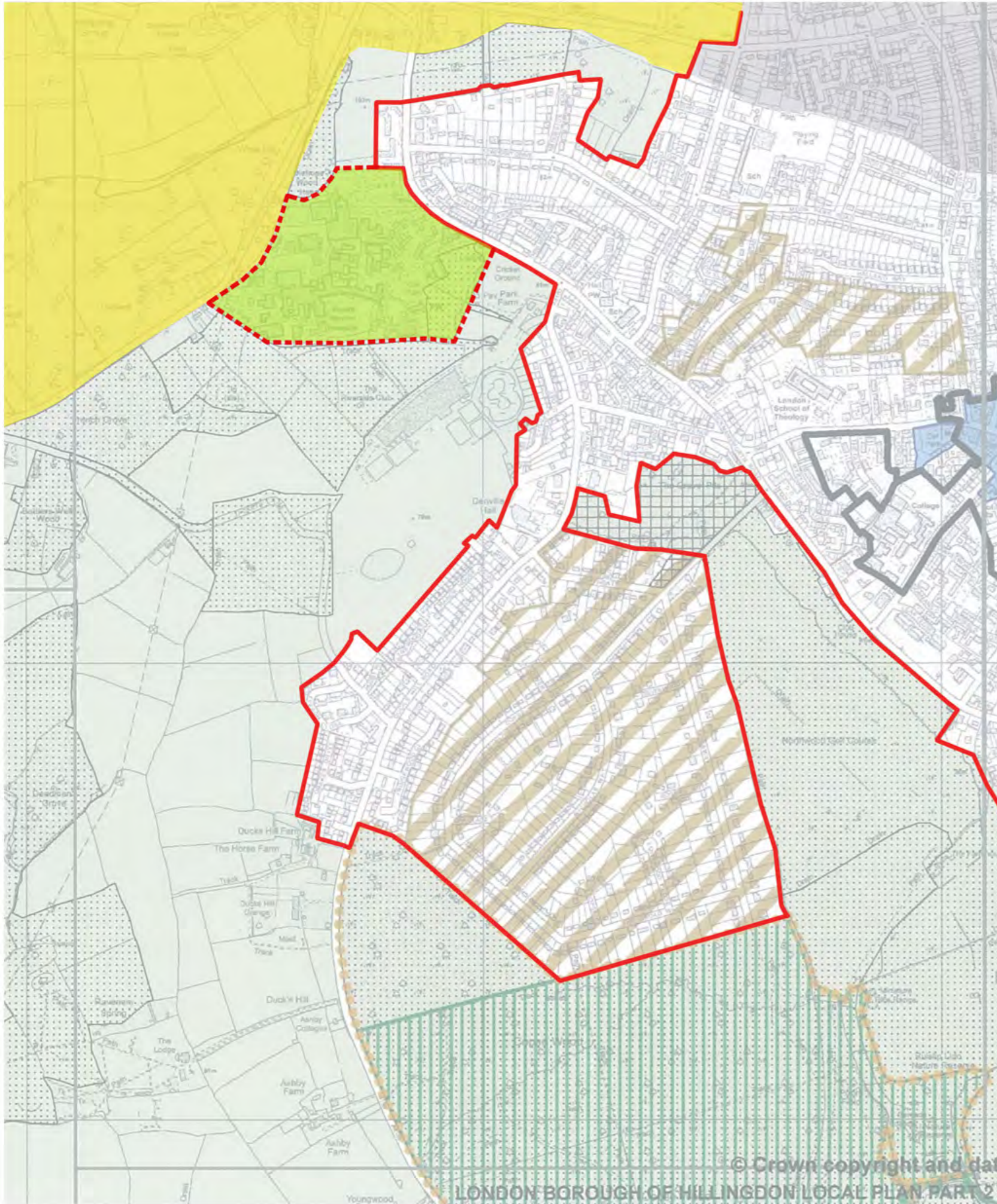
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A large black rectangular area covering the majority of the page, indicating that the content has been redacted.

Appendix 1:
Site Location Plan

Appendix 2:
Green Belt Plan

do not scale dimensions from this drawing



- Existing Green Belt boundary
- - - Proposed Green Belt boundary
- Land to be excluded from the Green Belt
- Existing Green Belt Three Rivers Local Plan

NOTE
boundaries shown are for general identification purposes only and must not be taken as defining legal title or ownership

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Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Proposed Green Belt
Boundary

Status
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Job number	Drawing number	Revision
23825	01/02	

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LONDON BOROUGH OF HILLINGDON LOCAL PLAN PART 2



HILLINGDON LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	East and North Hertfordshire NHS Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Lance
Last name	Flannigan
Company	Nexus Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	Table 6.1
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust ("ENHT"). ENHT is responsible for delivering healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including specialist cancer services at the Mount Vernon Hospital Site.

The Trust objects to the proposed extension of the existing Site of Nature Conservation Importance (Ref: SINC Extension 13) to include Land at the Mount Vernon hospital site, as identified in table 6.1 and detailed on page 147 of the Local Plan Part 2: Site Allocations and Designations Document. The area/ extent of the proposed extension to which the Trust raises objection is shown coloured yellow on the plan attached in Appendix 1 of these representations.

In summary, ENHT considers that the proposed SINC extension/ designation is not justified by the evidence, which clearly demonstrates that the land is not of sufficient nature conservation importance, either alone or in combination with the existing SINC designation, and does not meet the requirements for designation of a SINC.

Details of the ENHT objections set out below:

1. The basis for the proposed extension to the existing SINC designation to include land at Mount Vernon hospital is set out at paragraph 5.11-5.19 of the Site Allocations and Designations document. This text explains the process by which SINC's are identified, assessed and formally designated. In particular paragraph 5.16 and 5.17 explain that the basis of the proposed SINC extension to include land at Mount Vernon Hospital is the land's identification in the London Ecology Units Ecology Handbook 8, which in turn appears to be based upon fieldwork and assessment undertaken by the Unit in 2005.
2. It strikes ENHT that this represents an inadequate basis on which to designate land at the Mount Vernon Hospital site as a SINC, since the evidence is not sufficiently up to date and robust to justify the proposed designation. In particular, it takes no account of any changes which have taken place since 2007 and which may affect the nature conservation value/ importance of the land.
3. The Hillingdon Hospital NHS Foundation Trust has commissioned Ecosa, an ecology specialist, to survey the site and further evaluate the SINC designation to establish whether it is justified. The full report is attached as Appendix 2 and concludes that the proposed designation of land shown on the plan at Appendix 1 is not justified.

Please continue on a separate sheet if necessary

4. Finally ENHT point out that there is an inconsistency between table 6.1 and the details of the proposed designation set out on page 147 of the Site Allocations and Designation document. The former refers to the land's proposed designation as a Grade 2 SINC, whereas the latter refers to a Grade 1 designation.

However on the basis of the representations set out alone, it is clear that the land does not contribute to any part of the SINC designation, so this notion is pointed out directly for information.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The area of land to the south of the Mount Vernon Hospital is identified as a proposed extension to the SINC. However as identified within the ecology report that has been produced by Ecosa the northern area is partially tarmacked and separated into two fields with the southern area being tarmacked and used as the overspill car park.

Given the above, and the evidence provided by Ecosa it is clear that the site should not be designated as SINC. For this reason, we propose the site should not be included in the SINC extension.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

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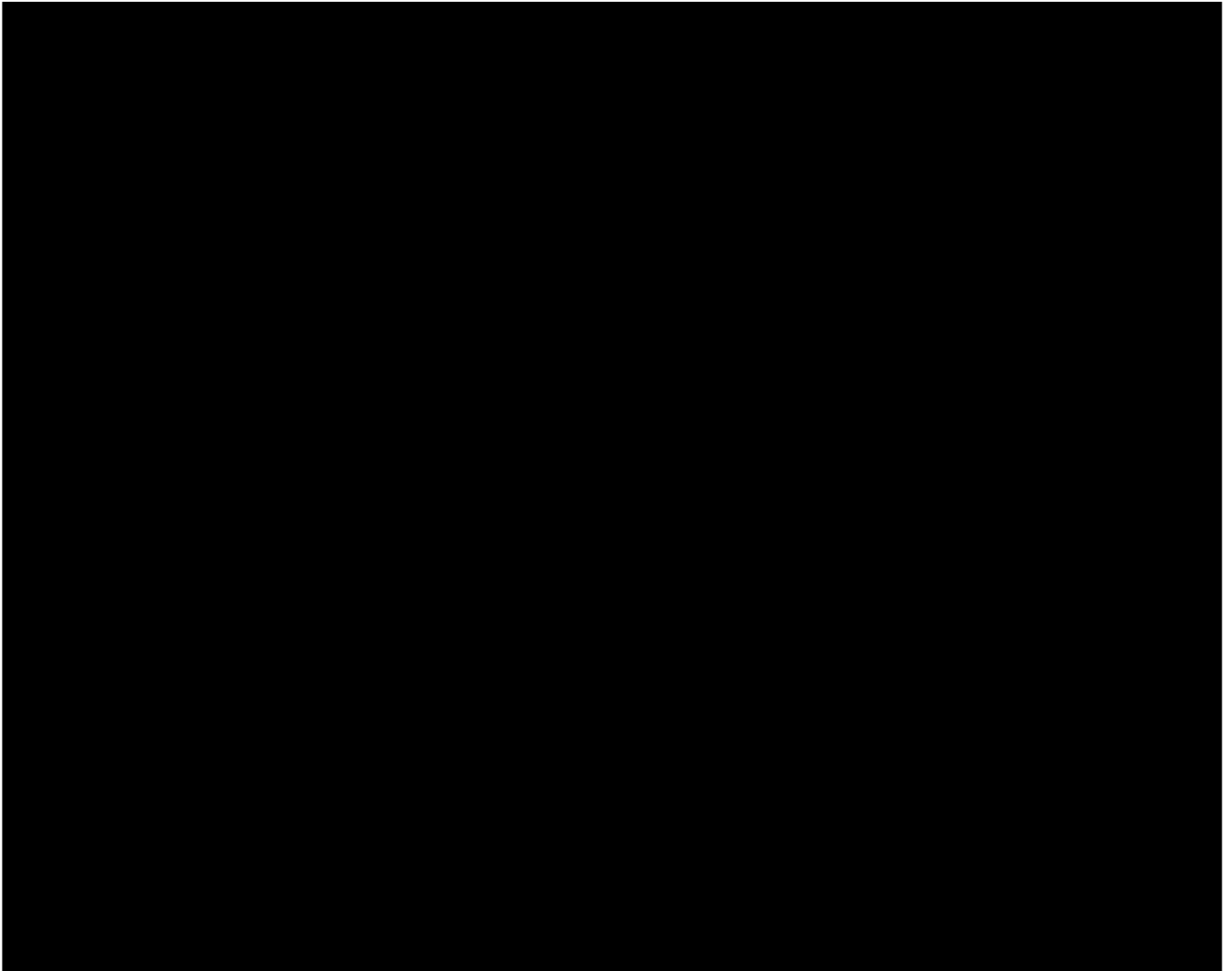
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For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

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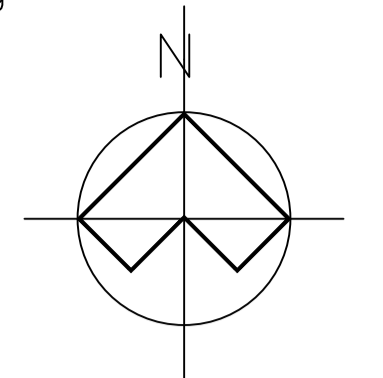
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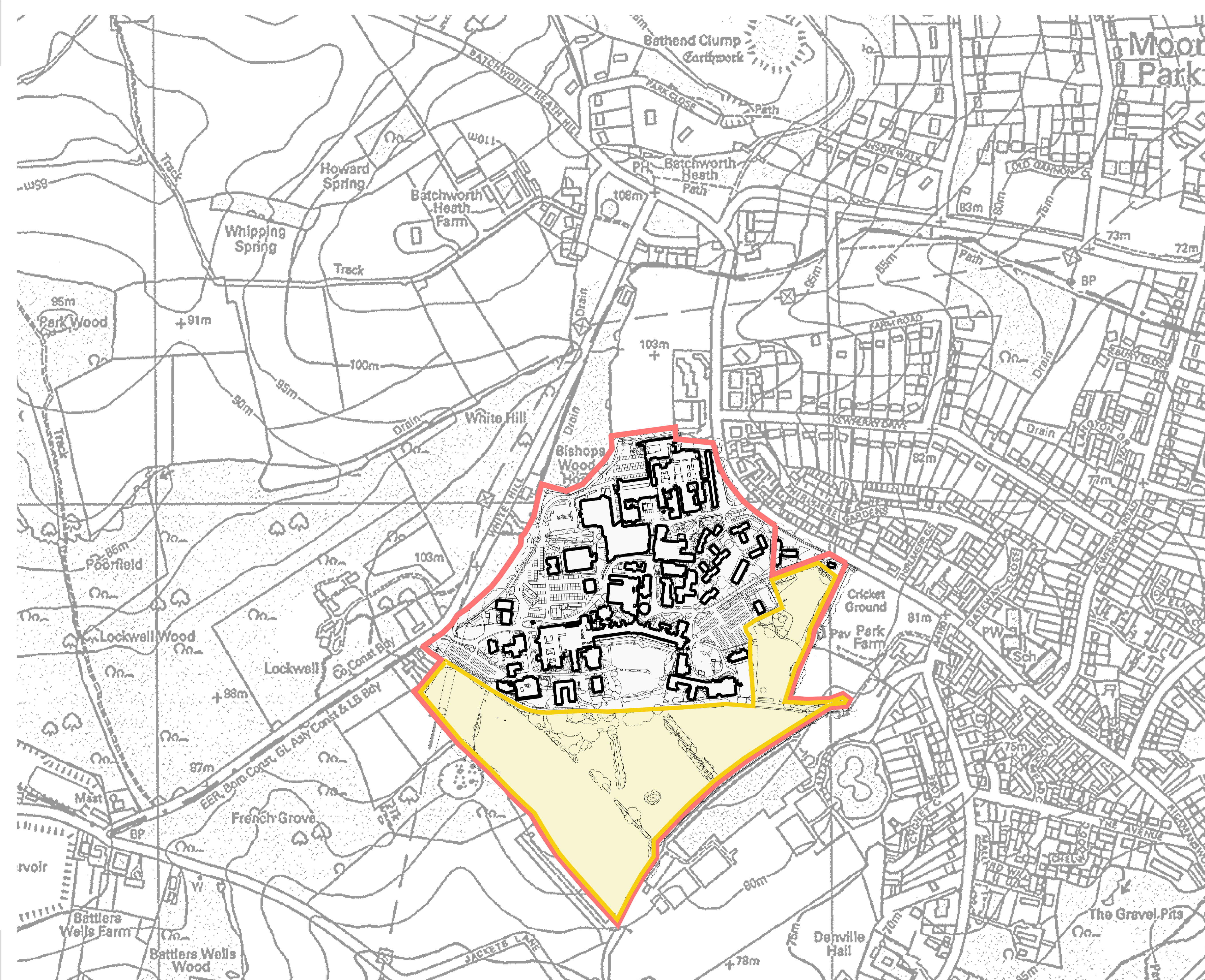




Appendix 1:
Site Location Plan

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-  Land owned by The Hillingdon Hospital NHS FT
-  Land to be excluded from proposed SINC

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Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Location Plan

Status	FOR IDENTIFICATION ONLY		
Scale	Drawn	Date	
1:2500 @ A1	AH / OS	2014	
1:5000 @ A3	Job number	Revision	
23825	01 / 04	-	

Appendix 2:

ECOSA Ecology Report

**LAND AT MOUNT VERNON HOSPITAL, RICKMANSWORTH ROAD,
NORTHWOOD, GREATER LONDON**

PHASE 1 HABITAT ASSESSMENT

Final Document

October 2014

Phase 1 and 2 Ecological Assessments • NVC • EclA • Management Plans • Protected Species Licensing
Habitats • Badger • Bats • Dormouse • Birds • Reptiles • Amphibians • Invertebrates • Riparian and Aquatic Species

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**LAND AT MOUNT VERNON HOSPITAL, RICKMANSWORTH ROAD,
NORTHWOOD, GREATER LONDON**

PHASE 1 HABITAT ASSESSMENT

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MAPS

Map 1 Phase 1 Habitats

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EXECUTIVE SUMMARY

- A Phase 1 habitat assessment was undertaken on 1st October 2014 at Land at Mount Vernon Hospital, Rickmansworth Road, Northwood, Greater London HA6 2RN. The site is listed within the Hillingdon Borough Local Plan (Part 2) as a proposed Site of Importance for Nature Conservation.
- The ecological assessment, comprising a Phase 1 habitat survey, was undertaken to ascertain the suitability of the site for designation as a Site of Importance for Nature Conservation.
- Land at Mount Vernon Hospital is situated on the south-western edge of the settlement of Northwood in the Borough of Hillingdon in north-west London. The centre of Northwood is located just over one kilometre to the east.
- The vegetation on site is roughly split between two sections. The area east of the hospital is largely composed of common and widespread habitats types with limited species diversity. A significant proportion of this area consists of a tarmac car park with no ecological value. The southern section of the site is composed of poor quality semi-improved neutral grassland fields with associated boundary tree lines, hedgerow and scrub.
- The data underlying the proposed SINC extension was collected during 2005, almost a decade prior to the proposed formal adoption of the land. During the interim, there have been changes to the land to the east of the hospital that reduce the ecological importance of this land at a Borough Level.
- It is recommended that the area to the east of the hospital is removed from the proposed SINC. Designating an area that is hardstanding is difficult to justify and the northern field no longer forms part of the larger management unit. Furthermore, the grassland in this area is mostly rank and has lost the neutral grassland characteristics that the proposed designation covers.
- The southern fields consist of poor examples of semi-improved neutral grassland with limited species diversity. This area was not considered to be of SINC quality because of the dominance of coarse grasses and scarcity of herbaceous species. There are other SINC designated for their neutral grassland in the local area and not designating the Mount Vernon site would not have a significant negative impact on the Borough of Hillingdon.
- It is recommended that the whole site is removed from the local plan.

1.0 INTRODUCTION

1.1 Background

Ecological Survey & Assessment Limited (ECOSA) have been contracted by Nexus Planning Limited to undertake a Phase 1 habitat assessment at Land at Mount Vernon Hospital, Rickmansworth Road, Northwood, Greater London HA6 2RN. The site is centred on National Grid Reference (NGR) TQ 077 916.

This report presents the findings of the Phase 1 habitat assessment carried out by ECOSA on 1st October 2014.

1.2 Aims and Scope of Report

This report is based on a Phase 1 field survey and desktop study which is aimed at assessing the suitability of the site for designation as a Site of Importance for Nature Conservation (SINC).

1.3 Background

The Greater London Authority (GLA) updated the ecological survey of the site during 2005 and recommended that the site be formally adopted as a SINC by Hillingdon Borough. However, this process was delayed and the proposed 'Fields and Hedgerows South of Mount Vernon Hospital' SINC was not included in the Hillingdon Borough Local Development Framework in 2006/07. During 2012 Hillingdon are currently consulting on their Local Plan Part 2, which is attempting to review the SINC's originally identified during the GLA work in 2005 and formally adopt these sites. Hillingdon adopted its Core Strategy (or Local Plan Part 1) in 2012 but this did not deal with the allocated land for SINC's.

1.4 Site Setting and Description

Land at Mount Vernon Hospital is situated in the London Basin Natural Area, described by Natural England as follows¹:

"The London Basin is a large, trough-like basin which was formed around 50 million years ago, and is filled with mostly sands and clay sediments. About one-third of the area is covered by London and the wildlife of the Natural Area is characterised by islands of semi-natural habitats. These habitats include large areas of woodland, with extensive stands of mature beech woods, significant areas of lowland mixed deciduous woodland and numerous large wood pastures and parklands. There are also notable areas of heathland in the Natural Area.

¹ Natural Areas are defined by Her Majesty's Stationery Office as 'biogeographic zones which reflect the geological foundation, the natural systems and processes and the wildlife in different parts of England, and provide a framework for setting objectives for nature conservation' (Biodiversity: The UK Steering Group Report, HMSO, 1995).

The London Basin is drained by the River Thames and its extensive network of tributaries. It also has numerous canals, with some areas that are very rich in plants and invertebrates. Other freshwater habitats include a series of flooded gravel pits and reservoirs that support nationally important populations of waterfowl. Associated with many of these freshwater habitats are areas of grazing marsh, neutral grasslands and fens."

The site is situated on the south-western edge of the settlement of Northwood in the Borough of Hillingdon in north-west London. The centre of Northwood is located approximately 1.3 kilometres (km) to the east. Other built up areas associated with Greater London are located in the vicinity of the site include Ruislip (4km south), Pinner (4.5km south-east) and Rickmansworth (4.4km north-west).

The wider landscape is split between urbanised areas to the east and semi-natural landscapes associated with farmland and patches of woodland to the south and west. Larger woodlands are associated with Bishop's Wood Country Park 380m to the west and Ruislip Wood 1.6km to the south.

The site itself is made up of five fields to the south of the hospital plus an overflow car park and small field to the east. The fields are bounded and bisected by thick hedgerows and tree lines. The hospital grounds border much of the northern boundary of the site, beyond the site to the east there is a cricket pitch and health centre. To the south and west are more fields used as pasture and a small pocket of broadleaved woodland.

1.5 Site Proposals

The survey area is proposed as a Site of Importance for Nature Conservation within the Hillingdon Borough Local Plan Part 2. The site covers an area of approximately 12 hectares.

2.0 METHODS

2.1 Introduction

This section details the methods used during the Phase 1 habitat assessment undertaken at Land at Mount Vernon Hospital, Northwood, Greater London.

2.2 Desk-Based Assessment Methods

2.2.1 Biological Records Centre

Greenspace Information for Greater London (GiGL) was consulted for information on non-statutory and statutory designated sites within a 1km radius of the site.

2.3 Phase 1 Field Assessment

The Phase 1 ecological field survey was carried out on 1st October 2014. The survey involved a walkover of the site to identify the habitat types and assess their value at a Borough level. Details of the species-specific survey methods are given below.

2.3.1 Vegetation

An assessment was made of all areas of vegetation within the site using the standardised Phase 1 survey methodology². This involved a walkover survey to identify broad vegetation types, which were then classified against Phase 1 habitat types. A list of characteristic plant species for each vegetation type was also compiled.

2.4 Phase 1 Survey Timing and Weather Conditions

The Phase 1 habitat survey was carried out by Simon Boswell of ECOSA on 1st October 2014. The weather conditions were occasional sun with approximately 20% cloud cover, an ambient temperature of 20°C and light south-westerly wind.

2.5 Phase 1 Survey Equipment

During the Phase 1 survey the surveyor was equipped with 10x40 binoculars, a 20x magnification hand lens and a digital camera.

2.6 Phase 1 Survey Limitations

The survey was undertaken at a time of year when some species of plant are either dormant or not in flower. Therefore, the survey of the vegetation in the proposed SINC was based on those species that were still flowering or that could be identified from their vegetative characteristics.

² Handbook for Phase 1 habitat survey: A technique for environmental audit – Field manual (2003), *Joint Nature Conservation Committee (JNCC)*

3.0 RESULTS

3.1 Introduction

This section details the results of the Phase 1 habitat assessment undertaken at Land at Mount Vernon Hospital, Northwood, Greater London during October 2014.

3.2 Desktop Study

3.2.1 Statutory and Non-statutory Designated Sites

The GiGL search revealed that there are no statutory and five non-statutory designated sites of nature conservation situated within a 1km radius of the site. Details of these designations are provided in **Table 2**.

Table 2: Designated sites located within a 1km radius of the Land at Mount Vernon Hospital site

Designation	Name	Relative Location	Reason for Designation
SINC (Borough Grade II)	Fields and Hedgerows South of Mount Vernon Hospital	On-site	A small number of fields with broad hedgerow and scrub borders. The fields are dominated by false oat grass <i>Arrhenatherum elatius</i> .
SINC (Borough Grade I)	Shepherd's Hill Wood and Fields	Adjacent, east	A large mosaic of fields and small woods with thick inner connecting hedges, creating a distinctly rural feel. A variety of habitats are present including ancient woodland and semi-improved neutral grassland.
SINC (Borough Grade I)	Kewferry Roughs	350m, north	Two formerly grazed meadows which have retained good habitat quality in spite of scrub encroachment. Habitats present include semi-improved neutral grassland, scrub and secondary woodland.
SINC (Borough Grade II)	Gravel Pit, Northwood	450m, south-east	An area of heavily wooded former gravel diggings. The woodland present is secondary and dominated by sycamore <i>Acer pseudoplatanus</i> .
SINC (Borough Grade II)	Bishops Wood	300m, north-west	Bishops wood is a small area of woodland dominated by pedunculate oak <i>Quercus robur</i> and hazel between White Hill and Mount Vernon Hospital. There is extensive standing and fallen deadwood within the woodland.

The survey site is entirely located within the 'Fields and Hedgerows South of Mount Vernon Hospital' SINC which is shown in the GiGL search as being of Borough Importance, Grade II. As explained within Paragraph 1.3 this 'SINC' in fact not yet designated and appears in the GiGL data search in error.

3.3 Vegetation Survey Results

The spatial distribution of habitats on site is shown in **Map 1**. The vegetation within the site is described here in general terms using Phase 1 habitat survey terminology

and referring to dominant, characteristic and other noteworthy species in each vegetation type within the survey area. The habitat types on site consist of:

- Semi-improved neutral grassland
- Poor semi-improved grassland
- Hardstanding
- Tree line
- Dense scrub
- Secondary woodland
- Fence
- Species-poor intact hedgerow

3.3.1 *Semi-improved Neutral Grassland*

The grasslands to the south of Mount Vernon Hospital were characterised by abundant tall fescue *Festuca arundinacea* and frequent meadow buttercup *Ranunculus repens*, cock's-foot *Dactylis glomerata* and perennial rye grass *Lolium perenne* (**Figure 1** and **Figure 2**). The fields appear to have been grazed fairly recently but no stock was present at the time of the survey. There were occasional herbaceous species within the sward including meadow vetchling *Lathyrus pratense*. The meadows were considered a poor example of the National Vegetation Classification³ (NVC) MG5 *Cynosaurus cristatus-Centaurea nigra* community.



Figure 1: Facing south-east across western field showing semi-improved neutral grassland



Figure 2: Facing south-east along south-western boundary showing semi-improved neutral grassland and intact hedgerow

3.3.2 *Poor Semi-improved Grassland*

The field to the east of the hospital had a short sward at the edges created by rabbit *Oryctolagus cuniculus* grazing (**Figure 3**). The northern section of this field was ranker with abundant smooth sow thistle *Sonchus oleraceus* associated with a drain

³ The National Vegetation Classification is a detailed method of classifying habitats based on the plant species composition present. It is specifically designed for use within the United Kingdom and is used extensively.

cover, the presence of this species, usually associated with disturbed ground, would indicate some recent soil disturbance (**Figure 4**). This northern section was considered more similar to poor-semi-improved grassland rather than semi-improved neutral grassland. The eastern field appears to have been mown in the recent past.



Figure 3: Rabbit grazed edges of eastern field with abundant broad-leaved dock



Figure 4: Northern end of eastern meadow showing abundance of smooth sow-thistle

The relative abundances of species is shown in **Table 3** relates to the southern fields and eastern field. The frequencies are based on the DAFOR scale where D = dominant, A = abundant, F = frequent, O = occasional, R = rare, L = locally, P = present (frequency not estimated).

Table 3: Species abundances within on-site grassland

English Name	Scientific Name	Eastern Field	Southern Fields
Agrimony	<i>Agrimonia eupatoria</i>	-	R
Ash saplings	<i>Fraxinus excelsior saplings</i>	R	-
Autumn hawkbit	<i>Scorzoneroides autumnalis</i>	R	R
Black knapweed	<i>Centaurea nigra</i>	O (LF)	R
Bird's foot trefoil	<i>Lotus corniculatus</i>	-	R
Bramble	<i>Rubus fruticosus</i> aggregate (agg.)	R	-
Broad-leaved dock	<i>Rumex obtusifolius</i>	F	R
Cock's-foot	<i>Dactylis glomerata</i>	O	F
Common fleabane	<i>Pulicaria dysenterica</i>	R (LO)	-
Common ragwort	<i>Senecio jacobaea</i>	R	R
Common sorrel	<i>Rumex acetosa</i>	O	R
Cranesbill sp.	<i>Geranium sp.</i>	R	-
Creeping bent	<i>Agrostis stolonifera</i>	O	O
Creeping buttercup	<i>Ranunculus repens</i>	F	F
Creeping cinquefoil	<i>Potentilla reptans</i>	O	R
Creeping thistle	<i>Cirsium arvense</i>	O	O (LA)
Dandelion	<i>Taraxacum</i> agg.	R	-
False oat grass	<i>Arrhenatherum elatius</i>	O	O
Fescue sp.	<i>Festuca sp.</i>	O	O
Field bindweed	<i>Convolvulus arvensis</i>	R	R
Germander speedwell	<i>Veronica chamaedrys</i>	O	-
Hard rush	<i>Juncus inflexus</i>	R	-
Hogweed	<i>Heracleum sphondylium</i>	R	R
Lesser burdock	<i>Arctium minus</i>	O	-
Lesser trefoil	<i>Trifolium dubium</i>	-	R

Table 3: Species abundances within on-site grassland

English Name	Scientific Name	Eastern Field	Southern Fields
Meadow barley	<i>Hordeum brachyantherum</i>	-	R
Meadow vetchling	<i>Lathyrus pratense</i>	-	O
Michaelmas daisy	<i>Aster</i> Species (sp.)	O	-
Nettle	<i>Urtica dioica</i>	R	-
Ox-eye daisy	<i>Leucanthemum vulgare</i>	R	R
Pendulous sedge	<i>Carex pendula</i>	O	-
Perennial rye grass	<i>Lolium perenne</i>	O	F
Red clover	<i>Trifolium pratense</i>	O	F
Ribwort plantain	<i>Plantago lanceolata</i>	O	R
Selfheal	<i>Prunella vulgaris</i>	-	R
Soft rush	<i>Juncus effusus</i>	R	-
Small timothy	<i>Phleum bertolonii</i>	-	R
Smooth sow-thistle	<i>Sonchus oleraceus</i>	R (LA)	-
Stone parsley	<i>Sison amomum</i>	R	-
Tall fescue	<i>Festuca arundinacea</i>	F	A
Willow saplings	<i>Salix saplings</i>	R	-
Yarrow	<i>Achillea millefolium</i>	O (LF)	-
Yorkshire fog	<i>Holcus lanatus</i>	F	O

3.3.3 Hardstanding

The area between the eastern field and more extensive field complex to the south is used as an overflow car park for the hospital (**Figure 5** and **Figure 6**). The tarmacadam appears to have been lain for some time and contains ephemeral vegetation including patches of annual meadow grass *Poa annua*, redshank *Polygonum Persicaria* and lesser burdock *Arctium minus*.



Figure 5: Facing west across overflow car park to the east of the hospital



Figure 6: Northern edge of car park showing access from hospital

3.3.4 Tree Line

Line of trees are scattered along the boundaries of the site. Most are composed of native species including horse chestnut *Aesculus hippocastanum*, pedunculate oak *Quercus robur*, ash *Fraxinus excelsior* and Sycamore *Acer pseudoplatanus*. Within the boundary features in the south there are a number of mature oak specimens. The south-eastern boundary of the southern section of the site is lined with a row of Leyland cypress x *Cupressocyparis leylandii* (**Figure 7**).

3.3.5 *Dense Scrub*

There are areas of dense bramble scrub scattered across the site including on the edges of hedgerows in the south. The most extensive areas of this habitat are associated with area to the south of the overflow car park. This area contains a large amount of dumped rubbish and litter including large items such as sofas and toys.

3.3.6 *Dry Pond*

The far eastern corner of the southern section of the site is shown as a pond on OS 1:25,000 mapping. At the time of the survey this area was heavily overgrown with bramble scrub and it was not possible view this water feature adequately, however the dense bramble cover would indicate that this feature is now dry.

3.3.7 *Secondary Woodland*

Small strips of secondary woodland were recorded in the eastern section of the site, these areas were characterised by a dense understorey and widely scattered semi-mature trees. There was no particularly dominant species within the canopy but oak, ash and sycamore were most frequently recorded.

3.3.8 *Fence*

A fence is present between the eastern boundary of the northernmost field and the adjacent cricket ground (**Figure 8**).



Figure 7: Leyland cypress tree line along south-eastern site boundary



Figure 8: Eastern field showing wooden fencing

3.3.9 *Species-poor Intact Hedgerow*

A section of blackthorn *Prunus spinosa* dominated species-poor intact hedgerow is located along the south-western boundary of the site (**Figure 2**). A second section of species-poor intact hedgerow is located to the east of the car park, this hedgerow contains field maple and hawthorn. Tree guards were still present on the shrubs and the maturity of the hedgerow would indicate that it was planted between 10-15 years ago.

3.3.10 Vegetation Summary

The vegetation on site is roughly split between two sections. The area east of the hospital is largely composed of common and widespread habitats types such as hardstanding and poor semi-improved grassland with limited species diversity. A significant proportion of this area consists of a tarmacadem car park with no ecological value. The eastern section was considered to be of **low ecological value**. The southern section of the site is composed of semi-improved neutral grassland fields with associated boundary tree lines, hedgerow and scrub. This area was considered to be of **medium ecological value**.

4.0 EVALUATION, IMPACTS AND RECOMMENDATIONS

4.1 Introduction

This section presents the conclusions of the Phase 1 habitat assessment. It provides an initial assessment of the likely ecological constraints to the proposed development and detailed recommendations for any further survey work or mitigation measures considered necessary.

4.1.1 Summary

Habitat within the proposed SINC includes large semi-improved neutral grassland fields with boundary tree lines, hedgerow and scrub. The section to the east of the hospital consists of a tarmacked car park and a northern field mainly comprising poor-semi-improved grassland.

The data underlying the proposed SINC extension was collected during 2005, almost a decade prior to the proposed formal adoption of the land. During the interim, there have been changes to the land to the east of the hospital that reduce the ecological importance of this land at a Borough Level.

4.1.2 Suitability of Site for SINC designation

Semi-improved neutral grassland is not a Biodiversity Action Plan habitat within the London area, however good examples of this type of grassland are now relatively scarce nationally. Neutral grassland requires management to retain species diversity, usually in the form of low input grazing. The five connected fields in the south of the site form a management unit that can still be managed through grazing and this area could be retained as semi-improved neutral grassland. The tarmacking of the former field to the east of the site hospital has effectively severed the small field north of the car park from the management unit in the south. This has resulted in this area being mechanically mown with the arisings being left *in situ*. Mechanically mowing grassland and leaving the cuttings has the effect of increasing nutrients within the soil through decomposition of arisings allowing vigorous grasses to outcompete and smother herbaceous species. Furthermore, the northern area of this field has been disturbed in the recent past and ruderal vegetation is becoming dominant in the sward.

4.1.3 Recommendations

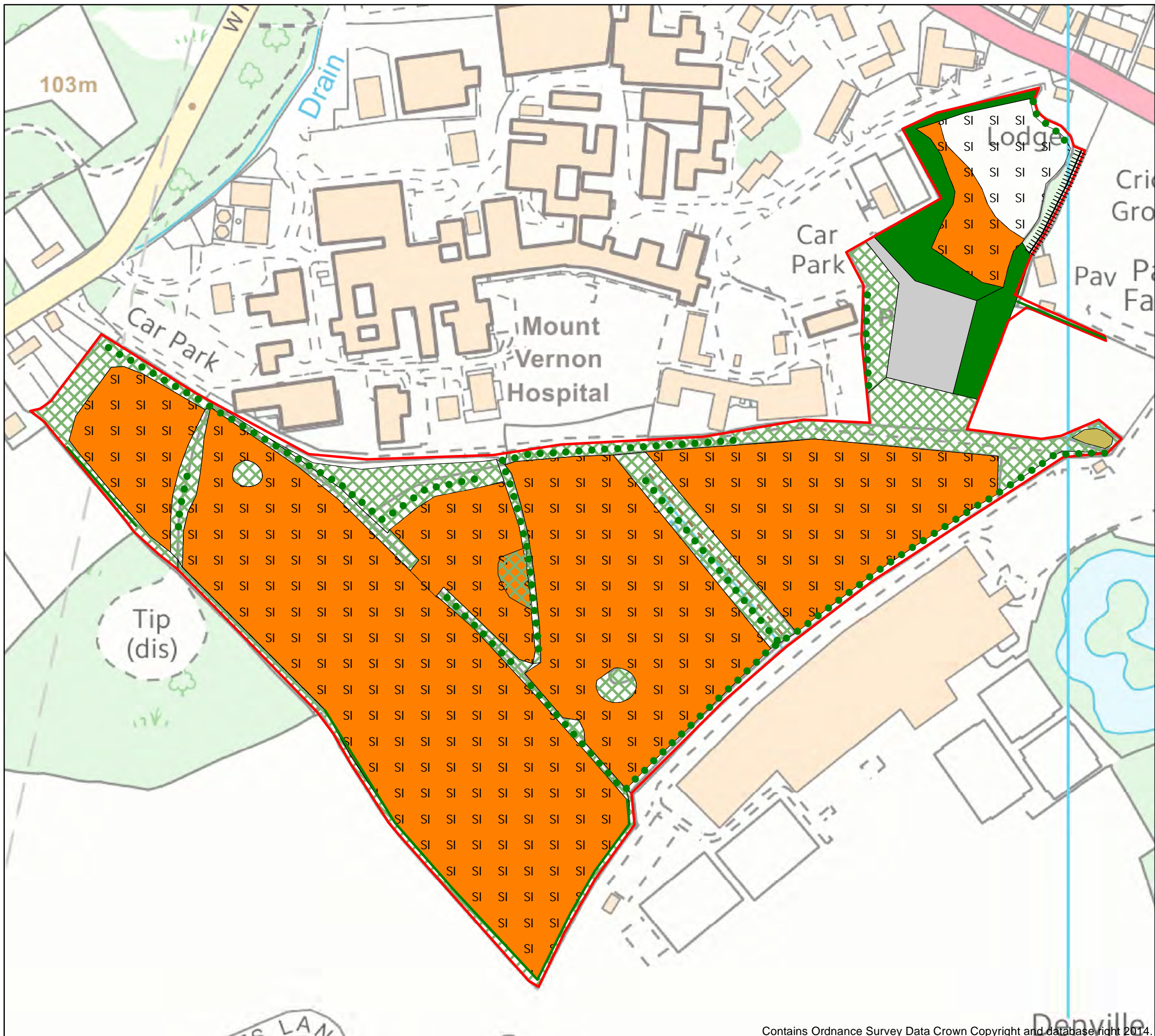
Designating an area of hardstanding for its nature conservation interest is difficult to justify and the northern field no longer forms part of the larger field system and management unit. Furthermore, the grassland in the eastern area is mostly rank and has lost the characteristics of neutral grassland. Taking these facts into consideration

it is recommended that the area to the east of the hospital is removed from the area proposed as a SINC.

The southern fields consist of poor examples of semi-improved neutral grassland with limited species diversity. This area was not considered to be of SINC quality because of the dominance of coarse grasses and scarcity of herbaceous species. There are other SINC's designated for their neutral grassland in the local area and not designating the Mount Vernon site would not have a significant negative impact on the Borough of Hillingdon.

It is recommended that the whole site is removed from the local plan.

Map 1 Phase 1 Habitats



LAND AT MOUNT VERNON HOSPITAL, NORTHWOOD

PHASE 1 HABITAT ASSESSMENT

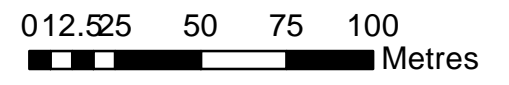
Map1 - Phase 1 Habitats

Client:	Nexus Planning
Date:	October 2014
Status:	Draft

KEY

- Proposed SINC Boundary
- Phase 1 Habitats**
- Secondary Woodland
- Dense Scrub
- Semi-improved Neutral Grassland
- Poor-semi-improved Grassland
- Dry Pond
- Hardstanding
- Intact Species-poor Hdgerow
- Tree line
- Fence
- Dry Ditch

Scale at A3: 1:2,200



ECOSA

Ecological Survey & Assessment Limited





HILLINGDON LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	East and North Hertfordshire NHS Trust		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Lance
Last name	Flannigan
Company	Nexus Planning
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	Atlas of Changes Part 3

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations have been prepared by Nexus Planning Limited and are submitted on behalf of East and North Hertfordshire NHS Trust ("ENHT"). ENHT is responsible for delivering healthcare services across a wide geographical area within Hertfordshire, Bedfordshire and Essex including specialist cancer services at the Mount Vernon Hospital Site.

ENHT has made separate representations to the Local Plan Part 2 in respect of land at the Mount Vernon Hospital Site. Amongst other things, these representations seek the following:

- i) The removal of land at the Mount Vernon Hospital Site from the Green Belt. The extent of land to be removed is shown on the plan at Appendix 1 to these representations.
- ii) Deletion of the proposed extension to the Grade I SINC to include land at the Mount Vernon Hospital Site (Ref. SINC Ext 13) as shown on the plan at Appendix 2 to these representations.
- iii) The allocation of land at the Mount Vernon Hospital Site, as shown on the plan at Appendix 3 to these representations, as a housing site.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

To make the Local Plan Part 2 sound, ENHT considers it is necessary to amend the Policies Map (Atlas of Changes) as described in these representations (refer to Q5) and shown on the plans at Appendices 1, 2 and 3.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

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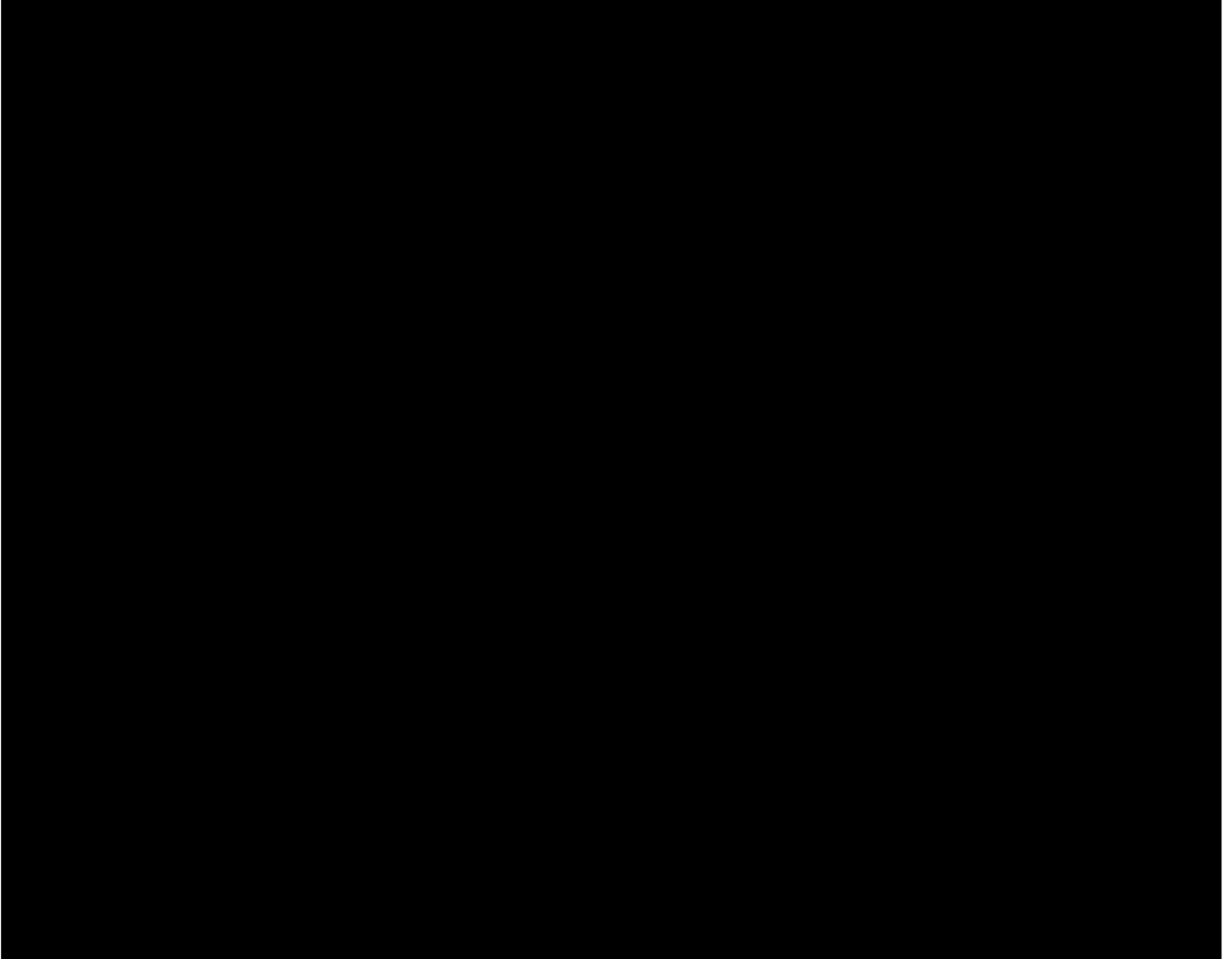
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

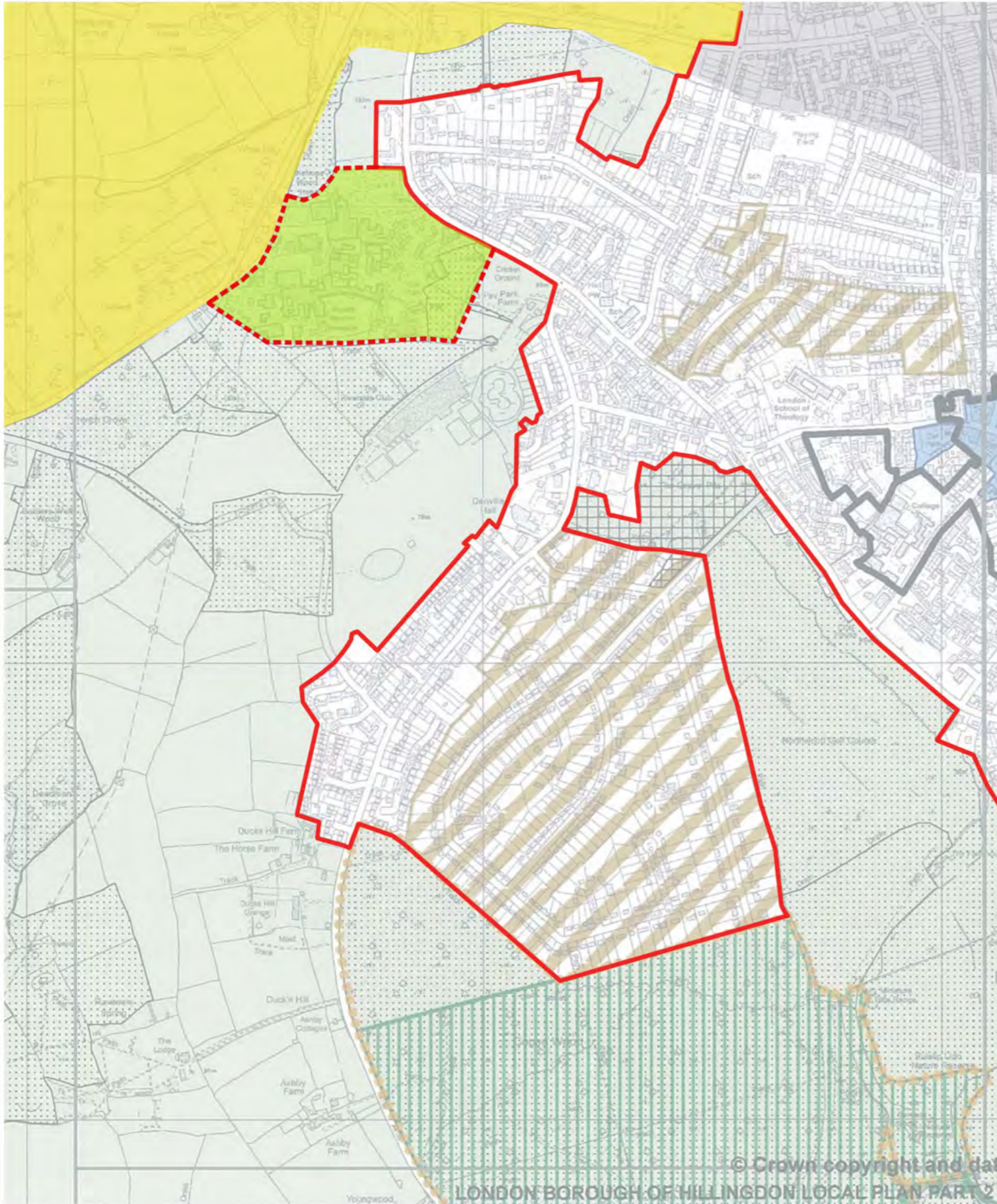
The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Appendix 1:

Proposed Green Belt Boundary

do not scale dimensions from this drawing



- Existing Green Belt boundary
- - - Proposed Green Belt boundary
- Land to be excluded from the Green Belt
- Existing Green Belt Three Rivers Local Plan

NOTE
boundaries shown are for general identification purposes only and must not be taken as defining legal title or ownership

BroadwayMalyan

3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Proposed Green Belt
Boundary

Status	FOR IDENTIFICATION ONLY		
Scale	Drawn	Date	
not to scale	AH	2014	
Job number	Drawing number	Revision	
23825	01/02		

Original size 100mm Copyright Broadway Malyan Limited

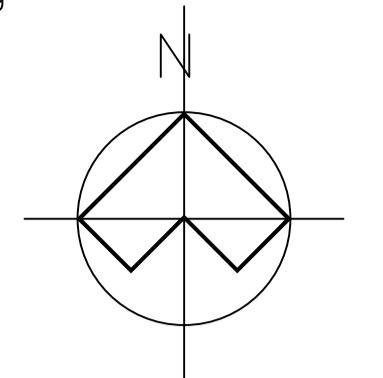
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LONDON BOROUGH OF HILLINGDON LOCAL PLAN PART 2

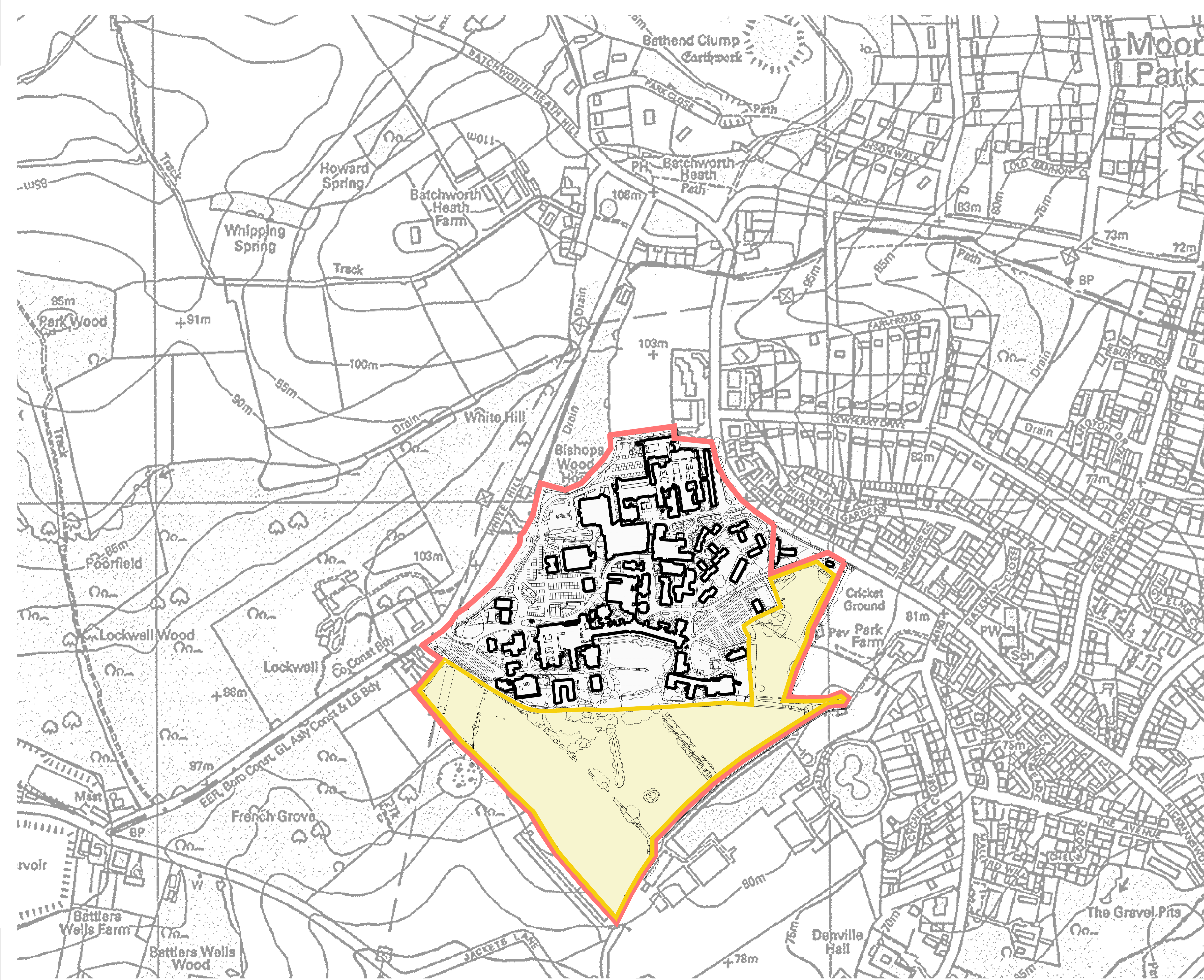
Appendix 2:

Deletion of the proposed extension to the
Grade I SINC

do not scale dimensions from this drawing



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- Land owned by The Hillingdon Hospital NHS FT
- Land to be excluded from proposed SINC

NOTE: boundaries shown are for general identification purposes only and must not be taken as definitive legal title or ownership

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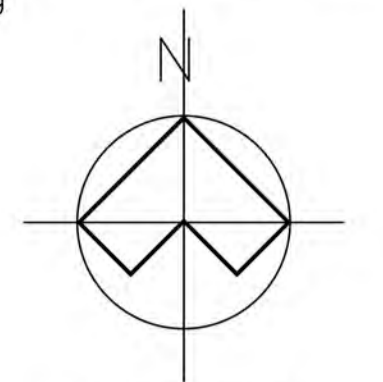
3 Weybridge Business Park
Addlestone Road
Weybridge, Surrey KT15 2BW
T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Location Plan

Status	FOR IDENTIFICATION ONLY		
Scale	Drawn	Date	
1:2500 @ A1	AH / OS	2014	
1:5000 @ A3	Job number	Drawing number	Revision
23825	01 / 04	-	

Appendix 3:
Preliminary Zoning Diagram

do not scale dimensions from this drawing



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- Site boundary
- Listed buildings
- The Hillingdon Hospital NHS FT retained area
- East and North Herts NHS Trust retained area
- Surplus area - residential, Phase 1 disposal
- Phase 2 disposal

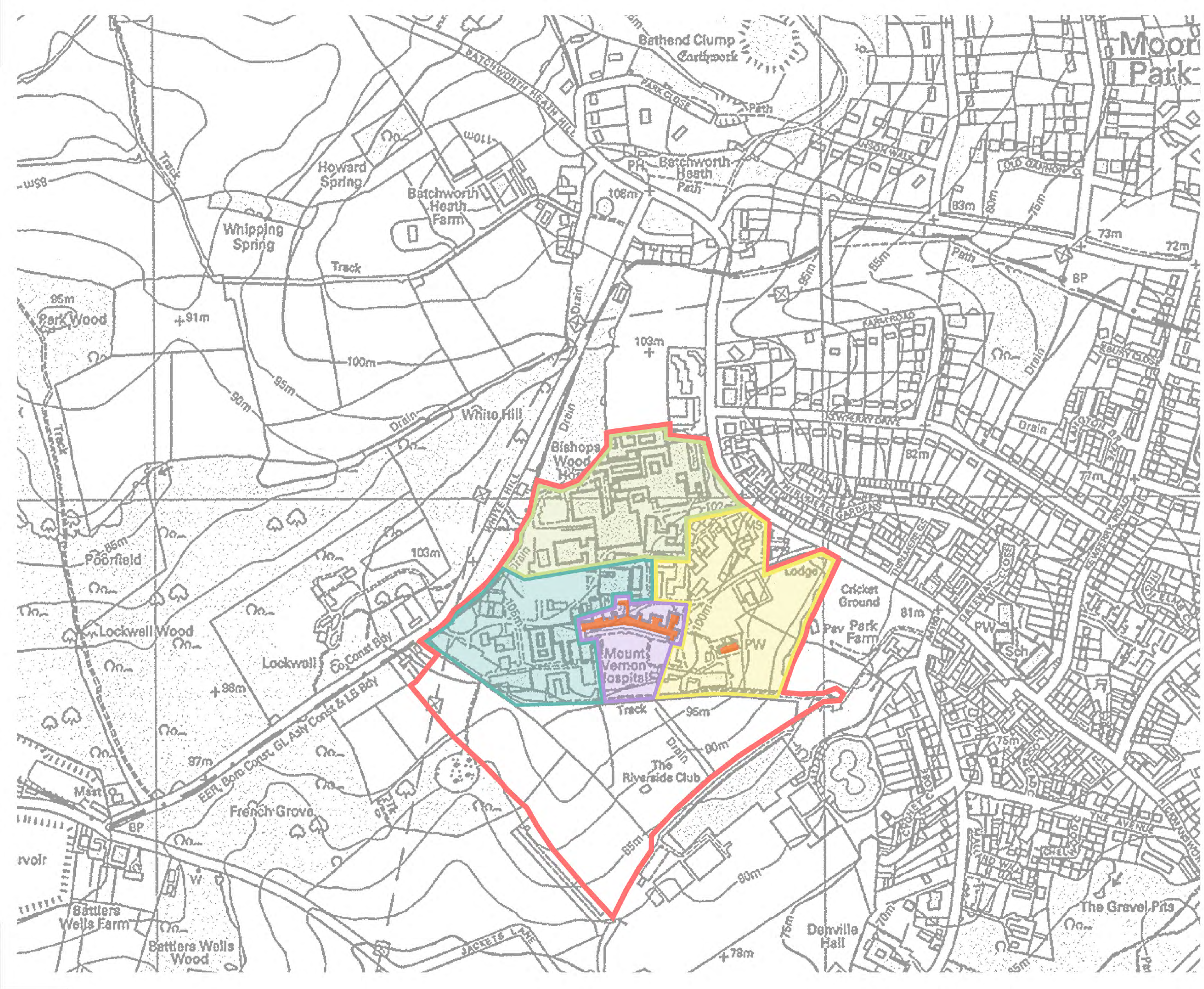
NOTE: boundaries shown are for general identification purposes only and must not be taken as definitive legal title or ownership

BroadwayMalyan
Planning

3 Weybridge Business Park
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T: 01932 845599
F: 01932 846043
E: Bmp@BroadwayMalyan.com

Client
The Hillingdon Hospital
NHS Foundation Trust
Project
Mount Vernon Hospital
Rickmansworth Road
Northwood
Description
Preliminary Zoning Diagram

Status
FOR IDENTIFICATION ONLY
Scale 1:2500 @ A1 Drawn AH / OS Date 2014
1:5000 @ A3 Job number Drawing number Revision
23825 01 / 03



Representations to the London Borough of Hillingdon Local Plan Part 2 (Reg 19)

**on behalf of East and North Hertfordshire NHS Trust
("ENHT")**

November 2014

This document encloses 7 representations relating to all three documents prepared by the Council.
The Representations are broken down as follows:

Development Management Policies

Rep 1: Changing the wording of paragraph 6.16
Rep 2: Inconsistency of paragraph 4.3

Site Allocations and Designations

Rep 3: Paragraphs 3.1 and 3.2 Housing Numbers
Rep 4: Table 3.2 Housing Site Allocation
Rep 5: Paragraph 5.1- 5.10 removal of Mount Vernon Hospital site from the Green Belt.
Rep 6: Table 6.1 SINC Extension

Policies Map (Atlas of Changes)

Rep 7: Atlas of Changes Part 3- Changes to the status of Mount Vernon Hospital.



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1. Name and Address			
Title	Mr		
First name	Wayne		
Last Name	Shurvinton		
Organisation (if relevant)	KFC (GB) Limited		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Steve		
Last name	Simms		
Company	SSA Planning Limited		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC 4
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Because the harm that the policy seeks to prevent has not been identified, it will also be impossible to assess whether the policy has been effective. No monitoring criteria are proposed by which to measure success and no action suggested to deal with any failure to be effective that may be assessed on review.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The amendments sought by KFC (GB) Limited, and the changes to the draft LP that would render it sound, are the deletion of part (B) of policy DMTC 4 of the draft LP and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Because the basis of our objections include concerns as to the an absence of evidential links or justification, the Council may produce additional evidence, which it may be necessary to test in the course of the examination.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

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Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Title	Mr		
First name	Wayne		
Last Name	Shurvinton		
Organisation (if relevant)	KFC (GB) Limited		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	Steve		
Last name	Simms		
Company	SSA Planning Limited		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC 4
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It is not clear what if any part of the evidence base relates to draft Policy DMTC 4 and in particular part (B) thereof. In the absence of any such reference or background, it is difficult to see how there can be a justification. Indeed, given the uncertainty as to what proximity or sensitivity might constitute, it is unlikely to be capable of justification.

Were part (A) of the draft policy more specific in terms of what level of concentration of such uses would be unacceptable, then it may be possible to justify that.

The supporting text at paragraphs 3.29 of the draft LP refers to several types of harm that night-time economy uses might be associated with. However, as restaurants and hot food takeaways are dealt with in the previous section of supporting text, it is not at all clear that they are included as potential sources of such harms.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The amendments sought by KFC (GB) Limited, and the changes to the draft LP that would render it sound, are the deletion of part (B) of policy DMTC 4 of the draft LP and the inclusion within part (A) or a reference within part (A) to a definition of what will be considered an unacceptable concentration of the uses listed in part (A).

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Because the basis of our objections include concerns as to the an absence of evidential links or justification, the Council may produce additional evidence, which it may be necessary to test in the course of the examination.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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House name	c/o Agent		
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2. Agent's Name and Address (if applicable)			
Title	Mr		
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Last name	Simms		
Company	SSA Planning Limited		
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House name			
Address 1			
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County			
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PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
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<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC4
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

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Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We consider full regard has not been given to national policy and advice in preparing Policy DMTC 4 because National Planning Policy Framework (NPPF) paragraph 182 requires Local Plans to be “positively prepared, justified, effective and consistent with national policy”.

We do not consider a reasoned justification for the draft policy has been substantially provided in accordance with regulation 8 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

The supporting text at paragraphs 3.25-3.27 of the draft LP does not explain what a “sensitive community use” might be or why restaurants or hot food takeaways should be resisted in proximity to them or to schools.

This means the draft LP does not comply with sub-section 19 (2) (a) of The Planning and Compulsory Purchase Act 2004 (PCPA04).

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

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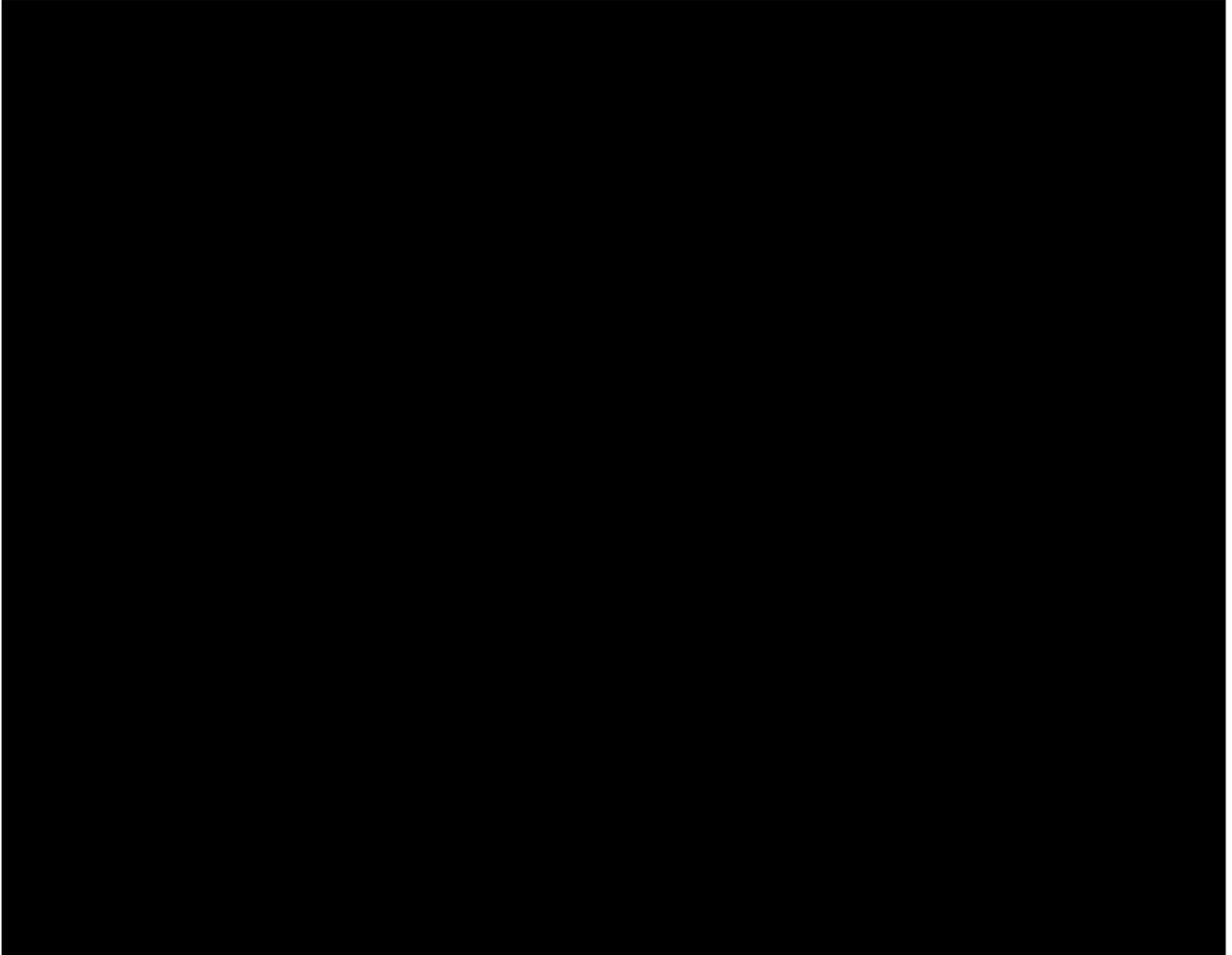
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Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
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Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC 4
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Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
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(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Because the specific harm that the policy seeks to prevent or issues it seeks to address have not been identified, it is also difficult to link it to any policy of the NPPF and because the onus is on the plan-making authority to establish consistency, it must be assumed at this stage that the policy does not comply.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

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Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

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Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



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Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC 4
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Map Number (Atlas of Changes)	

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	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

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The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for restaurants and hot food takeaways near to “schools and sensitive uses” as zero, but does so without evidence of any harm and the proximity of hot food takeaways to such uses. Consequently, in that sense, the development requirement has not been objectively assessed.

The fact that neither proximity nor sensitivity is defined means that the policy could have the effect of banning restaurants and hot food takeaways from a large majority of the Borough. Because no assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts.

The policy is negative in its assumptions, without being specific as to the harm it seeks to prevent. Furthermore, it assumes all restaurants and hot food takeaways must be the same in terms of their impacts. It refers to “resisting” such proposals rather than setting out clear circumstances in which they will or will not be acceptable.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

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No Yes

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Our Ref: SH/MR/1000
[REDACTED]



Planning Policy Team
London Borough of Hillingdon
3N/02 Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW

4th November 2014

To Whom it May Concern,

**HILLINGDON LOCAL PLAN PART 2 – DRAFT SITES AND ALLOCATIONS DOCUMENT
3 VIVEASH CLOSE, HAYES, HILLINGDON**

I write on behalf of my client, Elite Group, to submit a representation regarding the above planning policy document with regard to Policy SA 10: Land to the South of the Railway, Including Nestle.

Our client agrees that this is an important strategic site for Hayes Town and the borough as a whole. They consider this policy to be a suitable land use designation and fully support the inclusion of the policy in the Site Allocations document and the redesignation of the site for residential purposes.

However, we have two suggested amendments to be included which are outlined below.

Forming a comprehensive development scheme across the whole site

The policy states that a comprehensive development scheme should be formed across sites A and B, however we disagree with the inclusion of this statement.

Paragraph 173 of the NPPF seeks to ensure the viability and deliverability of development. It notes that 'pursuing sustainable development requires careful attention to viability and costs in plan-making and decision making.' It also notes that plans should be deliverable and sites should 'not be subject to such scale of obligations and policy burdens that their ability to be developed viably is threatened.'

The land which forms part of the designation is in fragmented ownership. Therefore, requiring a single a single planning application across the entire designation will create pressure on owners of the properties to sell to other landowners. This will undermine the aim of the policy to promote development on individual sites. This will also result in a less sustainable approach being adopted as financial gain will be seen as the key priority.



No. 3 Viveash Close forms a small part of this allocated land and we are concerned the priorities and potential of this site will not be sufficiently met if a single comprehensive plan is proposed for the whole of the area.

We therefore propose a more flexible approach, seeking the same priorities of the policy but allowing for landowners to manage their own development of their site.

The density calculations being based on existing density guidelines

Policy SA10 states '*proposals should be consistent with the PTAL rating and take into account lower suburban densities to the south.*'

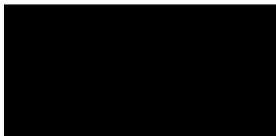
The density guidelines set out in emerging Development Management Policy are not relevant to the proposed site. Given the site's location adjacent to Hayes and Hillingdon Railway Station, the site should be considered suitable for more intense residential development than the guidelines imply. Part of the site falls adjacent to the Hayes and Harlington Cross Rail station, which means that rail transport will come in 2019 with 10 trains an hour at peak times.

Further, as the site is located adjacent to a railway it is in an optimum location for a tall building of high density. This location benefits from overlooking a railway line instead of buildings thus reducing the issue of overlooking or potential daylight/sunlight concerns.

I therefore recommend that the above two points are taken into consideration, given they enhance the development potential of the site.

Please do not hesitate to contact me with any further queries.

Yours faithfully,



Matthew Roe
Director



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Title	ELITE GROUP		
First name			
Last Name			
Organisation (if relevant)			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	MISS
First name	SOPHIE
Last name	HINTON
Company	Cgms Ltd
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
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Q1. I am commenting on:
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Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	SA 10
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

PLEASE REFER TO COVERING LETTER

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

PLEASE REFER TO COVERING LETTER

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

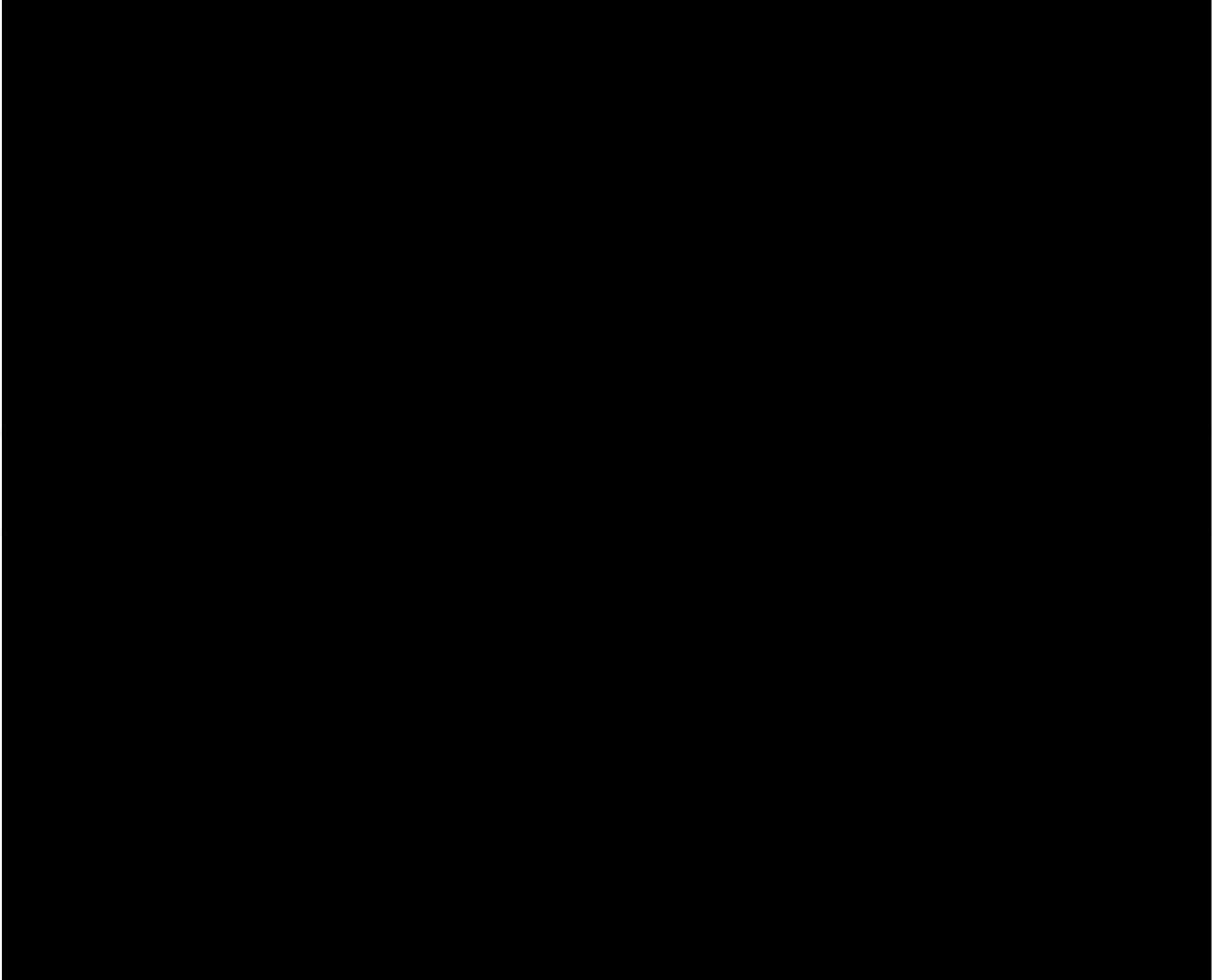
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Universities Superannuation Scheme Ltd.		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Ms		
First name	Julia		
Last name	Chowings		
Company	Deloitte Real Estate		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME1: Employment Uses in Designated Sites
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

USS's owns Units 1-16, Liddall Way Industrial Estate on Horton Road, which is designated as a Preferred Industrial Location by Policy SEA 1 of the emerging Site Allocations and Designations Document.

Policy DME1 states that the Council will support employment proposals in Preferred Industrial Locations (PIL). USS broadly supports this policy, but requests that the wording is amended in accordance with Box Q6 below in order to ensure compliance with the NPPF.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

USS requests that the council acknowledges the important role that sustainable alternative employment generating uses can have in the promotion of sustainable economic growth. Alternative uses such as classes C1, D2, retail or sui generis uses can positively contribute to employment provision and existing employment sites should not be constrained to the more limited range of B uses when they may not be viable. Alternative uses, such as hotels, can complement existing business functions and offer a higher density of employment opportunities than some B uses, such as warehousing. This more flexible approach would be compliant with Paragraphs 14 and 17 of the NPPF.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraph 5.6
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Paragraph 5.6 of the draft Site Allocations and Designations document states that The Council has undertaken a review of the Green Belt to identify areas that no longer meet the purposes of including land in the Green Belt and should be removed.

USS owns Maintenance Sheds in Stockley Park, on Furzeground Way, shown on the attached site plan. This site is an established maintenance area that is ancillary to Stockley Park, which is recognized as a key employment area in the Borough.

National Planning Policy Framework paragraph 80 sets out 5 purposes for including land in the Green Belt:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site is an established use and forms part of the wider Stockley Park Industrial Area. The USS Stockley Park site does not serve any of the above purposes for including land in the Green Belt and should be removed.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Removal of the Stockley Park Maintenance sheds from the Green Belt (as set out on the attached site plan), inclusion of the site in the list Green Belt Deletions on page 103 of the Site Allocations and Designations document.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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Stockley Park, Furzeground Way, Uxbridge



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Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)	Universities Superannuation Scheme Ltd.		
Unit		House number	
House name	c/o Agent		
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)			
Title	Ms		
First name	Julia		
Last name	Chowings		
Company	Deloitte Real Estate		
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	Paragraph 5.6
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Paragraph 5.6 of the draft Site Allocations and Designations document states that The Council has undertaken a review of the Green Belt to identify areas that no longer meet the purposes of including land in the Green Belt and should be removed.

USS owns Hayes Park, on Meadhouse Lane. This site is an established business park.

National Planning Policy Framework paragraph 80 sets out 5 purposes for including land in the Green Belt:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The site is an established use and does not serve any of the above purposes for including land in the Green Belt and should be removed.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Removal of Hayes Park from the Green Belt, inclusion of the site in the list Green Belt Deletions on page 103 of the Site Allocations and Designations document.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

N/A

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title	Mr		
First name	Christopher		
Last Name	Clark		
Organisation (if relevant)	CEMEX UK Properties Limited		
Unit		House number	
House name	[REDACTED]		
Address 1	[REDACTED]		
Address 2	[REDACTED]		
Town	[REDACTED]		
County	[REDACTED]		
Postcode	[REDACTED]		
Telephone	[REDACTED]		
Email	[REDACTED]		

2. Agent's Name and Address (if applicable)			
Title	Mr		
First name	John		
Last name	Adams		
Company	Deloitte Real Estate		
Unit		House number	
House name	[REDACTED]		
Address 1	[REDACTED]		
Address 2	[REDACTED]		
Town	[REDACTED]		
County	[REDACTED]		
Postcode	[REDACTED]		
Telephone	[REDACTED]		
Email	[REDACTED]		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	DMP Paras 1.1 / 1.2 and Para 4.2 SA&D Paras 3.1 and 4.1/4.2
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Overview

We are concerned that two significant material considerations - the demonstrable requirement for additional housing in the borough, and the need to provide a spatial context for the Heathrow Opportunity Area - are not currently being addressed in Hillingdon's plan making process.

Housing Supply

The Further Alterations of the London Plan ('FALP') were published in January 2014, and subject to Examination in Public in July 2014.

The FALP re-affirms the importance of increased housing supply in London (Policy 3.3) and, with reference to the GLA's Strategic Housing Market Assessment 2013, sets out average annual minimum housing supply targets for each borough until 2026. The FALP identifies an annual target for Hillingdon (2015-2025) of 559 dwellings, representing an increase of over 31% compared to the annual target of 425 dpa as set out in the London Plan 2011 and Policy H1 of the LP Part 1.

We also note that the Council expressed concern (during the FALP EiP) at the over-reliance placed on the delivery of small sites in the borough (under 0.25 hectares). There is little dispute that the FALP's housing figures, based on up to date demographic and household projections, are a realistic minimum requirement for each borough.

In our view, therefore, the Council must therefore begin planning for these revised figures now, at least by issuing an interim policy supplementing the existing housing targets of the Local Plan Part 1.

In the absence of this, we are therefore commenting on the Local Plan Part 2 to highlight the issue which is relevant to both the Development Management Plan and the Site Allocations and Designations document. Our representations also identify a large site in Harlington that could be brought forward as a contribution to local housing supply.

Heathrow Opportunity Area (HOA)

The FALP also restates the importance of the HOA with an indicative employment capacity of 12,000 and a minimum of 9,000 new homes. Policy E2 of the adopted Local Plan Part 1 states that *'Most of [the employment growth in the area] will be directed towards suitable sites in the Heathrow Opportunity Area, [and other key locations]...'*.

The LP Part 1 states (Policy E3) that LB Hillingdon will work with key partners to prepare and implement a spatial planning framework for the HOA. However, we understand that this document has still not been prepared and the HOA is only mentioned in passing in the draft DMP (Para 8.3).

This is a serious omission which should also be addressed now through the plan-making process.

Conclusion

We believe that the documents are unsound with these key omissions, and therefore fail all four tests of soundness. Please see the response to question 6 setting out how Local Plan Part 2 can be amended to become sound in these four areas.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

1. Preparation of an interim housing policy addressing the revised housing requirements for the Borough, as set out in the FALP.
2. Consequent changes to Development Management Plan paragraphs 1.1 / 1.2 and 4.2 and Site Allocations and Designations paragraphs 3.1 and 4.1/4.2.
3. Insertion of a policy regarding a spatial planning framework for the Heathrow Opportunity Area.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	SA&D Paras 5.2 – 5.7
Table or Figure Number; or	Table of proposed Green Belt deletions (pages 104 – 106)
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

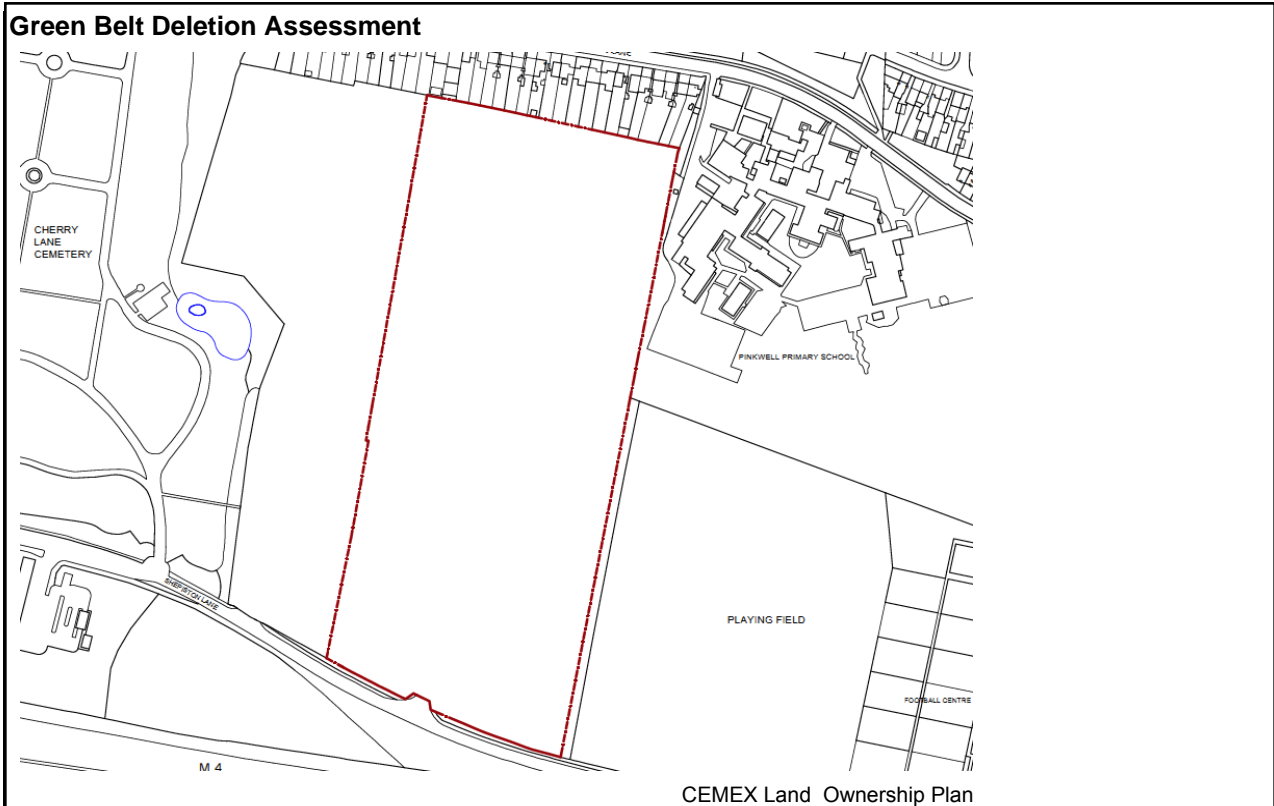
	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)



Frog's Ditch Farm, Shepiston Lane

The Council's 'Green Belt Assessment Update dated September 2013 included an analysis of CEMEX Frog's Ditch Farm, Shepiston Lane (see plan above).

This site was considered to perform one out of the five purposes of green belt land, as follows:

- § to assist in safeguarding the countryside from encroachment

Having regard to the circumstances which now prevail, and taking into account of the need to promote sustainable patterns of development, we consider that this land does not merit its current Green Belt designation and should therefore be included in the schedule of proposed Green Belt deletions.

The CEMEX site presently has an agricultural use but has previously been a landfill site, which results in poor agricultural yield. It should also be noted that the land is of limited scale and isolated from other agricultural holdings which further diminishes its value and viability for continued agricultural use.

The neighbouring site is owned by McGovern Brothers (Haulage) Limited and is in use by Hayes Gate Plant Hire for the storage of plant hire, scaffolding, trenching equipment including the parking of associated vehicles and the operation of an associated groundwork. Accordingly the present lawful uses are not consistent with a Green Belt designation.

We suggest that the combined landholding does not fulfil any of the purposes of Green Belt designation, having regard to existing and emerging needs for development. Red Line Plans for both sites are attached in **Appendix 1**.

A detailed Green Belt assessment of the combined site and its wider surroundings has been carried out on behalf of both landowners. This supports our contention that the site no longer serves a Green Belt function in relation to the need for development – in particular to respond to the significant additional housing target for Hillingdon, as identified in the emerging Further Alterations to the London Plan, and to support development associated with the emerging Heathrow Opportunity Area, as set out above.

We comment as follows on the Green Belt purpose ascribed to the site in the 2013 review:

Criterion 3: To assist in safeguarding the countryside from encroachment

The significant boundary to the site created by Shepiston Lane, the line of poplar trees which form the northern boundary of the road corridor and moreover the M4 corridor immediately to the south, effectively sever the site from consideration as part of the open countryside.

Whilst a part of the land is presently in agricultural use, it is demonstrably isolated from any other agricultural holdings and is, overall, of limited scale in its contribution both to openness and to a viable agricultural holding – indeed it can only be accessed along roads which are predominantly urban in nature.

Accordingly we invite consideration that where this site is functionally, visually and physically disconnected from any other area that can be considered to be or perform the function of open countryside, the objection site cannot reasonably continue to safeguard the countryside from encroachment

Paragraph 5.5 advises that minor adjustments to the Green Belt boundary will be undertaken in the Hillingdon Local Plan: Part 2 - Site Specific Allocations Local Development Document (LDD).

Summary

Overall, the combined land at Frog's Ditch Farm, Shepiston Lane does not perform any of the three identified purposes of Green Belt. This representation has demonstrated that its removal from the Green Belt is consistent with the general approach towards the location of sustainable development included within the National Planning Policy Framework.

We therefore consider that the Plan as published is unsound as it fails to provide a suitable framework for the delivery of the scale of development needed in the Borough. Moreover it fails to address the requirement not to preserve land in the Green Belt which does not serve a Green Belt function.

The combined site should therefore be added to the proposed schedule of Green Belt deletions (pages 104 to 106).

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add the combined site to the proposed schedule of Green Belt deletions (Pages 104 to 107 SA&D)

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME17: Development of Land Affected by Contamination
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME17 states that the Council will support the grant of planning permission for any development of land which is affected by contamination where it can be demonstrated that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use.

CEMEX broadly support this policy, but suggest that the wording is amended to include reference to financial viability, as set out in Q6 of this form. This proposed change would make Policy DME17 compliant with National Planning Policy Framework paragraph 173, which seeks to ensure viability and deliverability in the planning process.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

CEMEX consider that the wording of this policy should be changed as follows:

*Conditions will be imposed where planning permission is given for development on land affected by contamination to ensure all the necessary remedial works are implemented including the remediation of controlled waters. In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected and a S106 planning obligation will be sought, **taking account of the overall financial viability of a proposed scheme.***

This proposed change will ensure that the cost any necessary decontamination works do not unreasonably impact on the viability of a scheme and are taken into account when requesting other financial contributions. Decontamination can help bring forwards previously developed land that would otherwise be unsuitable for development, consequently the cost of this process and additional financial contributions required from the Council should not render a scheme unviable.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

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PART B - Your responses:

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Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME3: Office Development
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DME3 states that the Council will seek to accommodate the majority of planned office floorspace growth in Uxbridge town centre, Stockley Park and the Heathrow perimeter.

This policy should be amended to recognize the significance of the Heathrow Opportunity Area, which is recognized in the January 2014 Further Alterations of the London Plan as having an indicative employment capacity of 12,000 and a minimum of 9,000 new homes.

In addition, Policy E2 of the adopted Local Plan Part 1 states that '*Most of [the employment growth in the area] will be directed towards suitable sites in the **Heathrow Opportunity Area...***'.

The draft policy should be modified in accordance with Box Q6 to ensure consistency across emerging and adopted policy.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Policy DME3: Office Development should be amended to read:

A) The Council will seek to accommodate the majority of planned office floorspace growth in Uxbridge town centre, Stockley Park and the **Heathrow Opportunity Area**.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
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PART B - Your responses:

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Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMT2: Highways Impacts
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy DMT2 sets out requirements for highways impacts that must be met by any development proposal. The proposed requirements set out in bullet points (i) to (v) only address the safe and efficient movement of the highway. It is considered that this policy should be widened so that it is more obviously compatible with the range of highway matters addressed by NPPF paragraph 32.

Draft Policy DMT2 sets out additional requirements that are not consistent with the NPPF and should be modified accordingly.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Amend policy to be consistent with NPPF Paragraph 32.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

In order to elaborate our comments before the examiner.

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

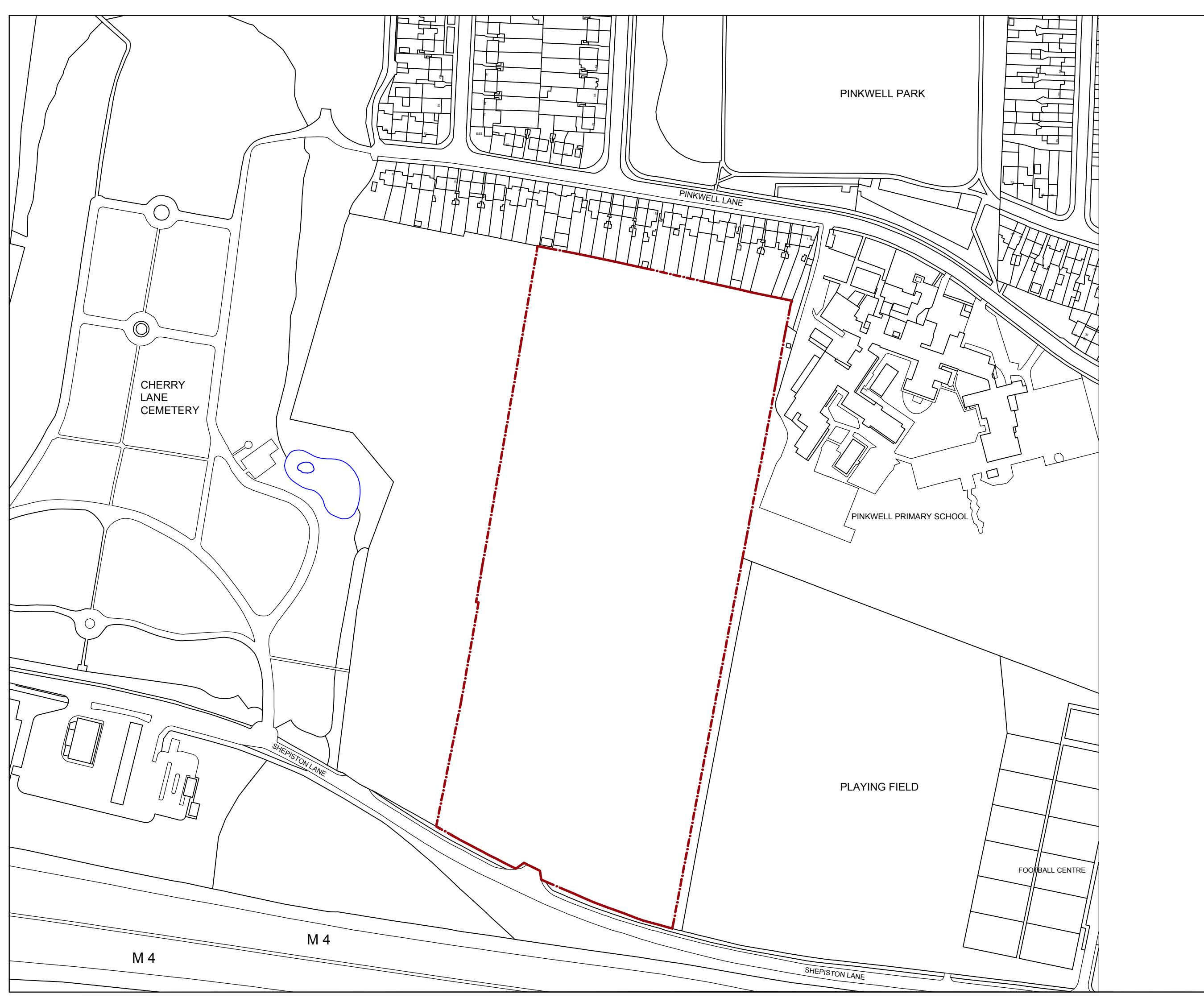
Appendix 1: Site Plans

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PLANNING



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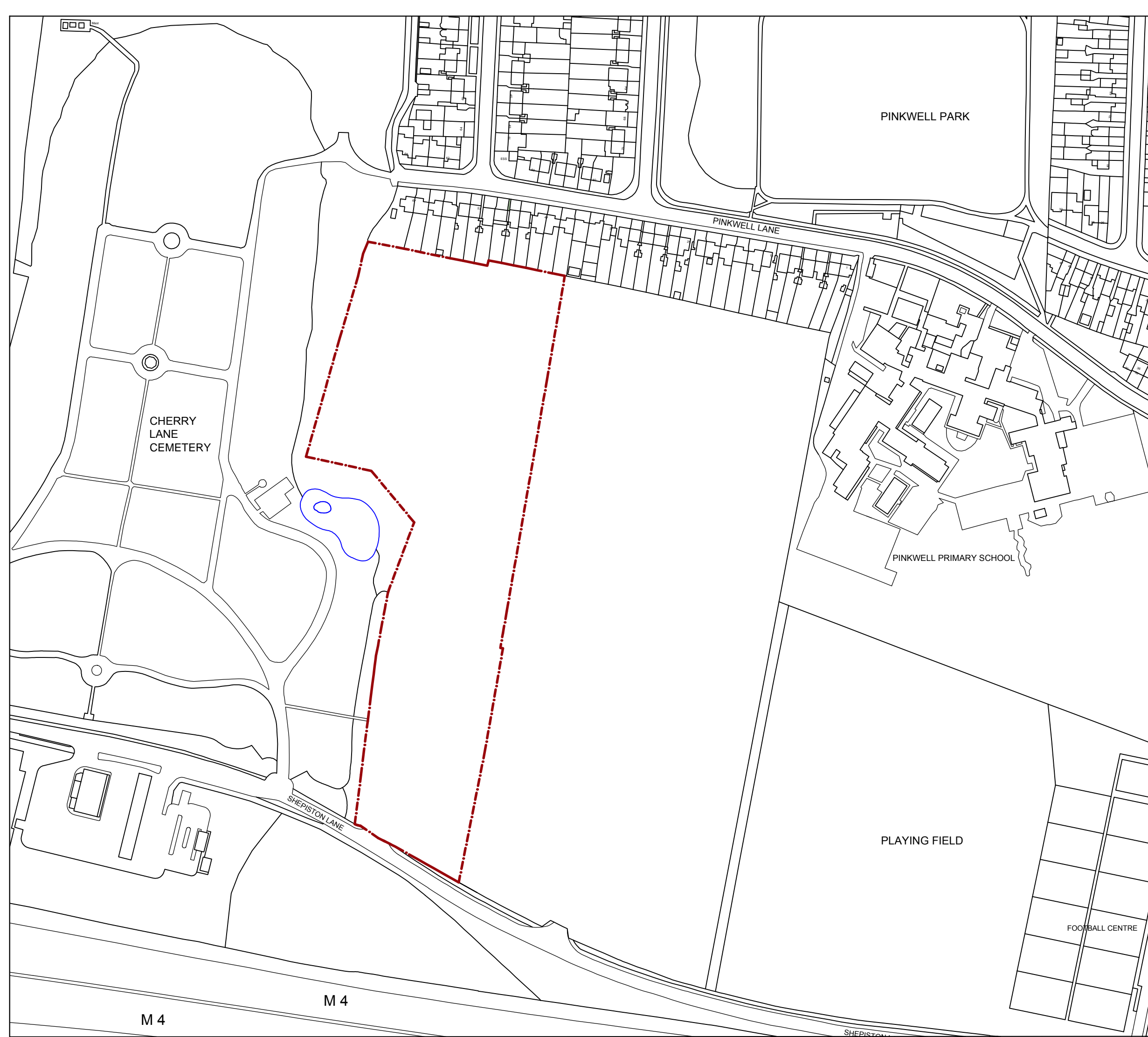
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Email: t.vekaria@saloria.co.uk website: www.saloria.co.uk

PROJECT
FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE
SITE PLAN – OWNERSHIP

DATE	20/10/2014	DRAWN BY	NA
SCALE	1:200 @ A3	CHECKED BY	LV

DRAWING NO. 130702/12/PO



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PROJECT

FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE

SITE PLAN – OWNERSHIP

DATE 20/10/2014 **DRAWN BY** NA
SCALE 1:200 @ A3 **CHECKED BY** LV

DRAWING NO. 130702/11/PO **REVISION**

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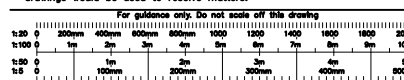
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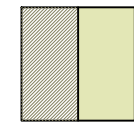
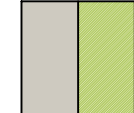
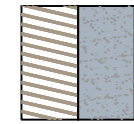

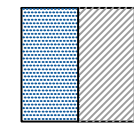
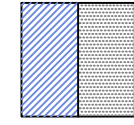


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PLANNING

LEGEND

-  SITE BOUNDARY
-  PROPOSED RESIDENTIAL DEVELOPMENT
-  PROPOSED BUFFER ZONE
-  PROPOSED HOTEL/COMMERCIAL [B1,B2,B8]
-  ROADS
-  SCHOOL
-  SURROUNDING RESIDENTIAL DEVELOPMENTS
-  CEMETERY
-  OTHER BUILDINGS

REVISION	DESCRIPTION	NO.	DATE
P1		NA	28/10



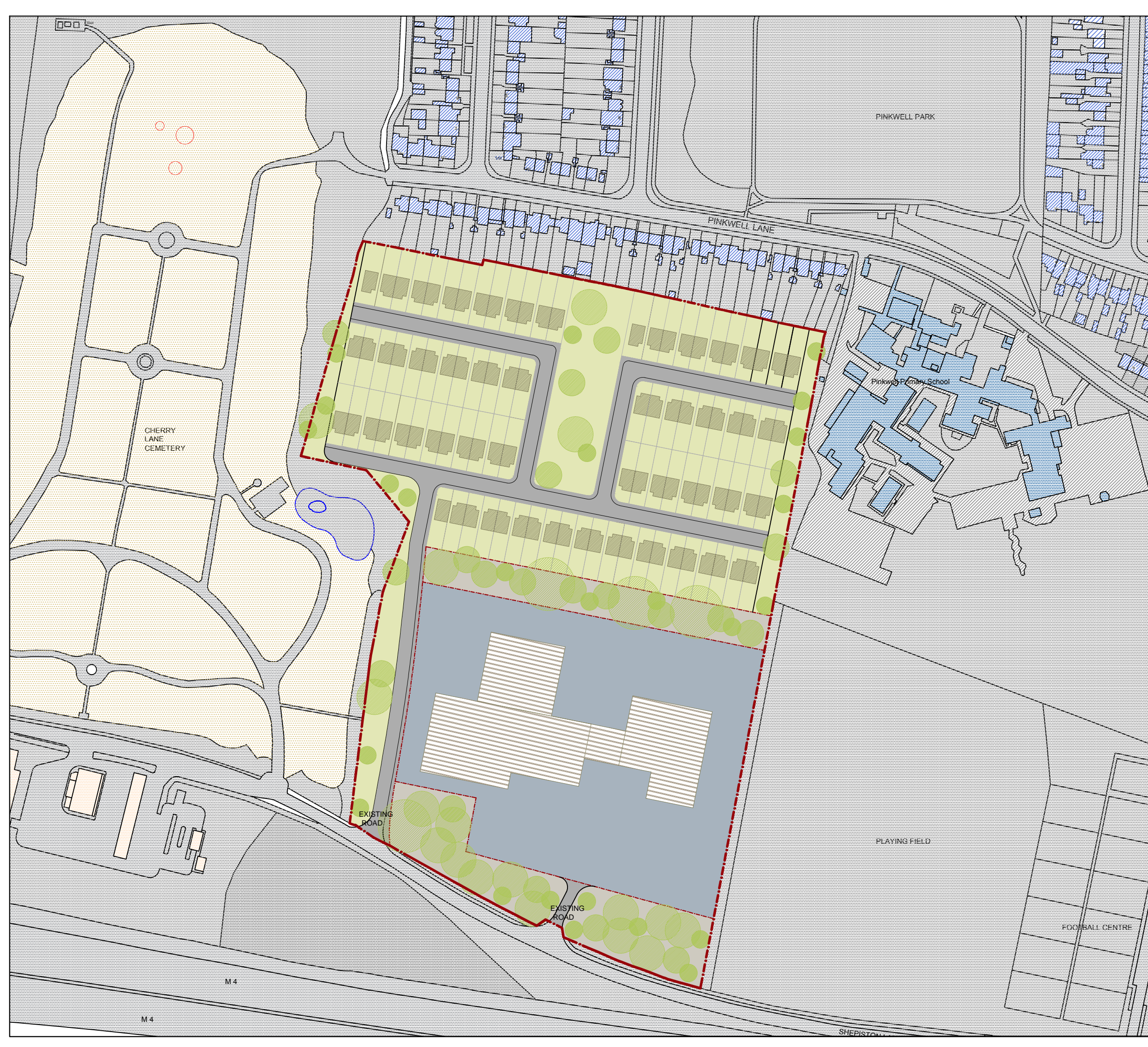
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PROJECT
 FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE
 SITE PLAN – OWNERSHIP

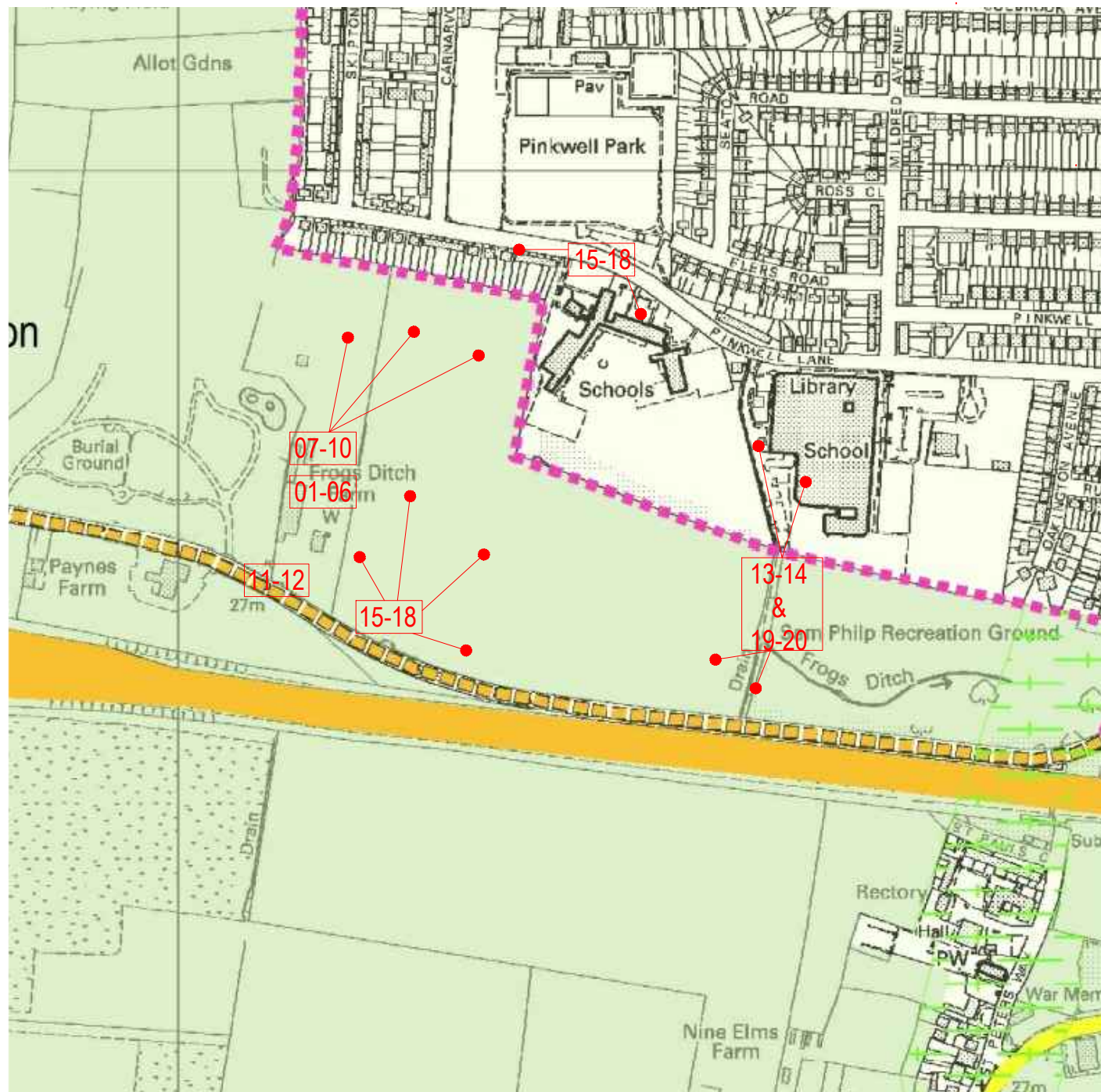
DATE 28/10/2014 **DRAWN BY** NA
SCALE 1:200 @ A3 **CHECKED BY** LV

DRAWING NO. 130702/08/P1 **REVISION**



Appendix 2: Visual Impact Assessment

Please see separate sheet



As part of determining the visual sensitivity of the site a number of site context photographs (1-22 inclusive) have been taken from the within the site and from the adjacent landscape.

These photographs were selected to demonstrate views towards the vicinity of the site and serve to illustrate its visibility in association with the wider surroundings and in addition to establishing the loss of openness of the site.

Site Context Photograph 1 - 6 is taken from within the land belonging to McGovern Brothers (Haulage) Limited which shows various buildings onsite. The large scale sheds and warehouses are dominant features in these views.

Site Context Photograph 7-10 is representative of views from Frogsditch Farm looking towards the north and east boundary of the site showing an urban mix of residential development along Pinkwell Lane, institutional development (Pinkwell Primary School) and recreational facilities. The wild bushes and trees adjacent within and adjacent to the site boundaries are visible in these views and obstruct a clear view of the scale of development in the surroundings.


Site Context Photograph 11-12 is taken from Shepiston Lane looking south across the road showing partial views of various built establishments further from the belt of trees along the road.

Site Context Photograph 13-14, 19-20 shows views of recreational developments in close proximity of the site. The football grounds to the east of the site and further east is the Harlington Adult Education Centre.

Site Context Photograph 15-18 is taken from within the land belonging to CEMEX looking towards the west, north, south and south-east of the site respectively.

Site Context Photograph 21-22 is taken from further north along Pinkwell Lane looking east and west. In photograph number 21 Pinkwell Primary School can be viewed which shares the site's north east boundary. Also, in photograph number 22, residential developments can be viewed which are adjacent to the site's north boundary.

The visual photographic appraisal identifies that the site has lost its openness and is surrounded by a mixture of urban developments.

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PLANNING			
P1	AS PER COMMENTS FROM CLIENT	NA	04/11
REVISION	DESCRIPTION	BY	DATE
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PROJECT FROGSDITCH FARM, CHERRY LANE, UB7 1LL			
DRAWING TITLE VISUAL IMPACT ASSESSMENT			
DATE 03/11/2014		DRAWN BY NA	
SCALE		CHECKED BY LV	
DRAWING NO. 130702/13a/P1			



01 -



02 -



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04



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06



07



08

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DRAWING TITLE VISUAL IMPACT ASSESSMENT			
DATE 03/11/2014	DRAWN BY NA		
SCALE	CHECKED BY LV		
DRAWING NO.	REVISION		
130702/13b/P1			



09 -



10 -



11 -



12 -



13 -



14 -



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17 -



18 -

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PROJECT FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE VISUAL IMPACT ASSESSMENT

DATE 03/11/2014	DRAWN BY NA
SCALE	CHECKED BY LV

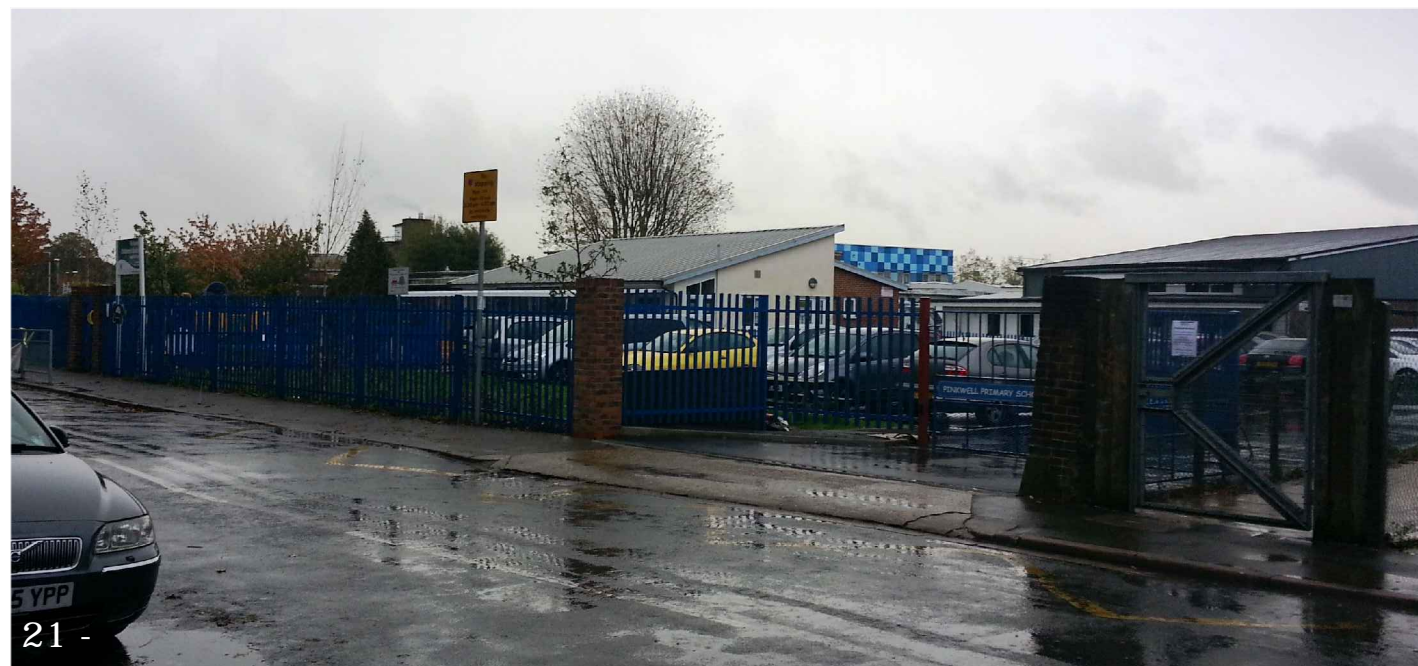
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19 -



20 -



21 -



22 -

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PROJECT FROGSDITCH FARM, CHERRY LANE, UB7 1LL

DRAWING TITLE VISUAL IMPACT ASSESSMENT

DATE 03/11/2014 DRAWN BY NA

SCALE CHECKED BY LV

DRAWING NO. 130702/13d/P1 REVISION

Planning Policy Team,
London Borough of Hillingdon
3N/02 Civic Centre
High Street,
Uxbridge,
UB8 1UW

4 November 2014

Dear Sir/Madam

LB Hillingdon Local Plan Part 2 Proposed Submission Consultation

We write on behalf of our client CEMEX UK Properties Ltd, to provide representations to the LB Hillingdon Local Plan Part 2 Proposed Submission Consultation.

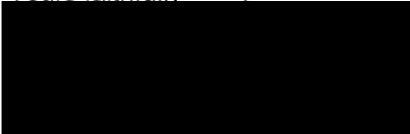
Deloitte Real Estate is instructed to advise on planning-related matters in respect of its national assets. CEMEX owns one site in Hillingdon, the extent of which is shown on the attached site plan (Appendix 1). The address is:

CEMEX Harlingdon
Frogsditch Farm
Shepiston Lane
Hillingdon

The attached representation form should be read in conjunction with the representations submitted by DLP Planning Ltd on behalf of McGovern Brothers (Haulage) Limited who own the adjoining parcel of land. CEMEX UK Properties Ltd and McGovern Brothers (Haulage) Limited wish to jointly promote these sites for removal from the Green Belt and wish to secure an allocation for development.

CEMEX is pleased to have the opportunity to comment on the emerging Local Plan, and requests that CEMEX continues to be updated on the programme of future planning documents. Should you have any queries on this correspondence, please contact Michael Bottomley on 0207 303 5636.

Yours faithfully



John Adams
Deloitte LLP

Enc. Consultation Response Form + Plans and Visual Assessment





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Ms
First name	Emma
Last Name	Beardmore
Organisation (if relevant)	St James Group Ltd
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	12.1 Proposed Road Safeguarding - Minet Country Park

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Road Safeguarding within the Minet Country Park is identified to reflect detailed planning permission granted in 2010 (application reference LBH 54814-APP-2009-430) (the "permitted scheme") which permits the following development:

"New access roads from the Hayes-by-pass and Southall Town Centre to the application site for vehicle, cycle and pedestrian access including drainage and a flood relief pond. Widening of South Road across the railway line, widening of South Road over the railway line for the creation of bus lane and three new access onto Beaconsfield Road. Two bridges over the Grand Union Canal and Yeading Brook to provide pedestrian and cycle access to the Minet Country Park and Springfield Road."

It is of note however, that Map 12.1 does not reflect or adequately take account of the Permitted Scheme. The reason for this is:

- a) the position of the road safeguarding on the plan is not in accordance with the position of the eastern access route approved under the Permitted Scheme; and
- b) the plan does not identify the location of the two further permitted pedestrian and cycle routes bridging the canal to provide access to the Minet Country Park and Springfield Road.

The plan has therefore failed to accurately locate or take account of all the routes approved pursuant to the Permitted Scheme and has for this reason not been positively prepared.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Map Number 12.1 should be amended to accurately reflect the scheme approved under planning permission LBH/54814-APP-2009-430 (the "Permitted Scheme"). As such, the plan should be amended to:

- a) show the position of the eastern access approved under the Permitted Scheme; and
- b) show the locations of the two pedestrian and cycle bridges approved under the Permitted Scheme.

Furthermore, the road safeguarding contemplated by Map 12.1 does not appear to have been considered alongside Ref: SINC Ext 6.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.





HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Ms
First name	Emma
Last Name	Beardmore
Organisation (if relevant)	St James Group Ltd
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	
Paragraph Number; or	5.19
Table or Figure Number; or	SINC Ext 6
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The extension to the Site of Importance to Nature Conservation pays no regard to the works approved under planning permission LBH-54814-APP-2009-430 and the safeguarding within the Council's Development Management Policies which permits works to create a new access from Pump Lane to the Southall Gas Works site, along with the drainage and flood relief works.

As such it is considered that the proposal to extend the SINC to include the area adjoining Pump Lane is unsound.

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

The extension to the SINC should be revised to omit the land adjoining Pump Lane, subject of the aforementioned planning permission.

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

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<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

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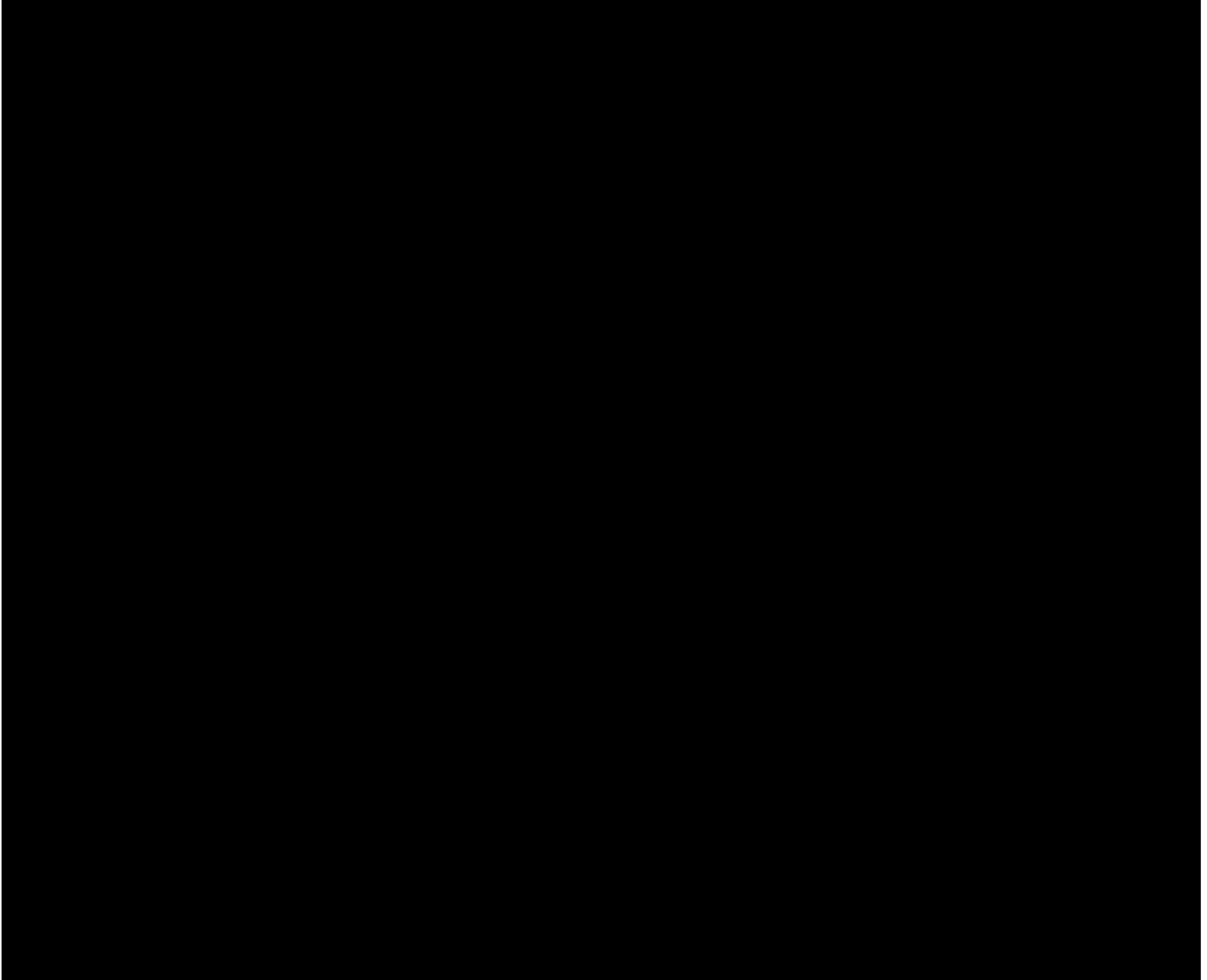
- **Email to:** localplan@hillingdon.gov.uk
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Comments on Local Plan Proposals

1 message

M & C Cartwright <[REDACTED]>
To: localplan@hillington.gov.uk

4 November 2014 17:23

Dear Sirs,

I oppose the proposal to remove Pinn Meadows and other cherished sites such as Eastcote House Gardens and Manor Farm from Hillingdon's Green Chain and to designate them instead as Metropolitan Open Land.

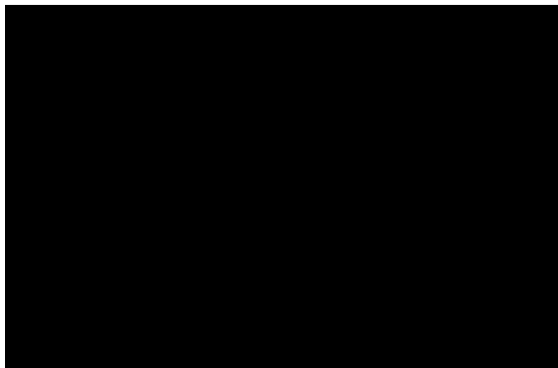
While designation as Metropolitan Open Land is welcome, the removal from the Green Chain is not. I believe that Hillingdon should follow the lead of other London Boroughs such as Southwark who have dual designation for all of their Green Chain sites.

The Council also proposes to weaken the wording of the existing Green Chain policy, allegedly to bring it more in line with Government policy to weaken protection for Green Spaces.

No other London Boroughs have done this. In July 2012, when he reported on Hillingdon's current Green Chain policy, the Planning Inspector described the Hillingdon's current policy as "effective and are consistent with the London Plan", and said no modifications were needed.

I urge the Council to retain the Green Chain designation for Pinn Meadows and to keep the existing Green Chain policy to give the greatest possible protection from future development.

Martin Cartwright MCIM



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Ms
First name	Nichola
Last name	Traverse-Healy
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Barton Willmore

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Policy SEA 1: Strategic Industrial Locations
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	Yiewsley Proposals Map

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

These representations are prepared on behalf of Powerday PLC in response to the Hillingdon Local Plan Part 2 Consultation. Powerday is a family owned recycling and waste management company founded in 1980. They currently operate a number of waste management sites in Greater London and are therefore a key stakeholder in the waste management industry.

Powerday currently have an interest in land associated with the former West Drayton Coal Depot on Tavistock Road. The Site is approximately 5.57 hectares in size and benefits from excellent transport links by both road and rail to/ from London and the west of England. Historically, the Site was a coal yard but more recently has been occupied by a

mixture of small scale light industrial and commercial business uses. In addition, the Site is occasionally used as a civic amenity site (Golden Weekends) for which it has an Environmental Permit.

Powerday is currently promoting the Site for waste management uses through the emerging West London Waste Plan. A recent planning application for a Materials Recycling Facility (MRF) and civic amenity site with a capacity of 950,000 tonnes was subject to a full environmental impact assessment which found that the site was suitable for the proposed use. Although the proposal was supported by the Greater London Authority (GLA), Hillingdon Council refused the application for transport (and air quality impacts associated with the traffic generated) reasons. To overcome these objections, Powerday is preparing a revised planning application which reduces the capacity of the site to 450,000 tonnes

The advantages of the Tavistock Road were accepted by the Mayor and we can do no better than summarise his conclusions as set out in his Report to the LPA on the planning application. The Mayor considered that the 950,000 tonne application 'broadly complies with the London Plan' albeit that the Mayor considered that 'there are some outstanding issues that need to be resolved and these and their potential remedies are set out below:

Principle of development: The development proposals have significant potential to support and capture the benefits of waste recycling, contribute to the Mayor's recycling level targets, while delivering the Mayor's waste policy and therefore, are supported in principle.

"Employment: The proposals will make a valuable contribution to the generation of jobs and the development is accepted strategically in this regard.

Urban design: The proposed design is generally accepted and in line with policies contained in chapter seven of the London Plan.

Inclusive access: Clarity of how inclusive access has been considered with regards to areas of the public realm is also sought for the scheme to be in line with London Plan policies 7.2.

Air quality: Before the scheme is referred back at stage two, relevant planning conditions will need to be secured by the Council.

Noise: Before the scheme is referred back at stage two, relevant planning conditions will need to be secured by the Council.

Climate change: The scheme fully complies with London Plan policy 5.2.

Transport: In order for the application to comply with the transport policies of the London Plan TfL requires that the applicant provides additional information on how freight will access the site by both road and rail, amend both the impact assessment and DSP, confirm the number of cycle and car spaces proposed, undertake a pedestrian audit and finally provide a Workplace travel plan for assessment' (para 66 of the Mayor's Report)."

This positive response reflects the reasons why Tavistock Road was identified by Mouchel as a potential site for waste management in the West London Waste Local Plan in 2011. The development potential of the site has been 'tested' through a planning application and the objections relating to traffic (and air quality) can be overcome.

Notwithstanding the progress of the Draft West London Waste Plan, in view of the Site's size, location, current use and proximity to the strategic road and rail network it is extremely concerning that the Council is seeking to de-allocate the land for industrial uses. This approach is in direct conflict with Policy SO15 which seeks 'to protect land for employment uses to meet the needs of different sectors

of the economy'. If Hillingdon is to remain a key industrial location the Local Plan needs to protect sites such as Tavistock Road for industrial type uses and processes. In the absence of any up-to-date evidence it seems nonsensical to de-allocate such a significant site in this location. For the reasons stated above Powerday object to the current approach set out in relation to designated industrial and employment sites, which is not considered justified and contrary to national planning policy. Given its current status the Site should be safeguarded as an existing industrial location.

Please set out what change(s) you consider necessary Land at the Old Coal Depot, Tavistock Road should be re-allocated as an existing industrial location. to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



- **Lesley Crowcroft**
Eastcote Conservation Panel

Site Allocations and Designations. Green Chain, MOL, Green Belt.
Upgrading of Green Chain to MOL.

River Pinn Green Chain.

The Eastcote Conservation Panel welcomes the extra status of MOL given to the many water meadows along side the River Pinn, Cheney Field, Long Meadow, Kings College Playing Fields etc. However, the Green Chain designation does not recognize more fully the biodiversity and nature conservation value of these areas.

LBH Landscape Character Assessment does draw attention to the fragility of the River Pinn corridor with the urbanization of many stretches of the River and the narrowness of the land either side of the river.

The Conservation Panel asks that the Pinn Meadows, which form the Celandine Route, link the Heritage sites Manor Farm Ruislip with Eastcote House Gardens, keeps Green Chain designation alongside MOL designation. This dual designation will afford this area as much protection against inappropriate development as possible.

The wording of Policy EM2: Green Belt, Metropolitan Open Land and Green Chains Hillingdon Local Plan part 1, was approved by the Planning Inspectorate during the examination of this document.

However, Policy DME15 Development in Green Chains has a slight change in the wording making the policy appear less robust than Policy EM2. To keep continuity between the two parts of the Hillingdon Plan the wording of DME15 should echo that of Policy EM2. The Conservation panel requests that the wording of policy DME 15 be the same as Policy EM2.

Request Inclusion into Green Chain Category. Policies Map Atlas of Changes.

Parkway open space linked to Colombia Avenue Open Space by railway embankment. Ruislip

This area gives a clear break in the urban fabric.

The two open spaces have recreational value, being situated in densely populated areas. The railway embankment link provides a wild life corridor.

For the reasons given above the Eastcote Conservation Panel requests that this area be given Green Chain Status.

Metropolitan Open Land extra inclusions for Policies Map Atlas of Changes

Re status of the Bessingby/Cavendish/Pine Gardens Park complex. [Cavendish Ward]

Request that the status of these parks be upgraded to Metropolitan Open Land.

The wards of Cavendish and Eastcote/East Ruislip have some of the highest density of population in the London Borough of Hillingdon.

This is currently rapidly expanding with the development at Pembroke Park [formerly RAF Eastcote] in Eastcote/East Ruislip ward. Initial House 150, Field End Road and 216 Field End Road both in Cavendish Ward.

In the section of the HLP Site Allocations and designations the following areas have been proposed for future development pages [14/ 15.] 269-285 Field End Road Cavendish Ward, Royal Mail Sorting Office, Manor Ward, Industrial site Braintree Road South Ruislip and the Site near Odyssey Business Park South Ruislip Ward.

Although not all of these designations are within Cavendish Ward, they are nearby and future residents will use the facilities afforded at B/C/PG parks.

The Bessingby/Cavendish/Pine Gardens complex is a valuable asset to this densely populated area

The criteria for designating a site MOL is as follows.

1. Providing a clear break in the urban fabric and contributing to the green character of London.
2. Including open air facilities serving the leisure, recreational, sports, arts and cultural needs of Londoners outside their local area.
3. Containing a feature of historic, recreational or biodiversity value of national or regional significance.

Within this park complex with Green Flag Status, there are many sports groups, football, bowls, cricket, tennis, some of whom play in competitions which bring visitors from other parts of London.

By its size the complex gives a much needed break in the urban fabric.

Cavendish/Pine Gardens, are designated as a Site of Importance for Nature Conservation [SINC]. Cavendish Pavilion is Locally Listed, and has historic significance.

The Hillingdon Open Space Strategy also noted that areas of Cavendish and Eastcote/East Ruislip wards are lacking in open space per capita of the population, which should be increased. South Ruislip Ward is noted to be lacking in accessible play space. With the proposed developments listed above there will be a great increase in the local population thereby increasing the need for more accessible play areas, leisure facilities and open space.

These circumstances make the Bessingby Complex very important to the local and wider area.

The Eastcote Conservation Panel request that MOL status be given to Bessingby/Pine Gardens/Cavendish parks.

**Re Warrender Park and Highgrove Woods. [Eastcote /East Ruislip Ward]
Request that these areas are upgraded to Metropolitan Open Land.**

In the section of the HLP Site Allocations and designations the following areas have been proposed for future development pages [14/ 15.] 269-285 Field End Road, Royal Mail Sorting Office, Manor Ward, Industrial site Braintree Road South Ruislip Ward, Land near Odyssey Business Park, South Ruislip Ward. There are not any large developments foreseen for Eastcote/East Ruislip Ward, however the proposals mentioned above and the nearing completion of Pembroke Park, the former RAF Eastcote site will impact upon E/ER. Developments such as 150 Field End Road [Initial House] sits on the border between Cavendish and E/ER wards, therefore, will impact on E/ER Ward.

Warrender Park and Highgrove Woods are very valuable assets in this densely populated area.

The criteria for designating a site MOL is as follows.

1. Providing a clear break in the urban fabric and contributing to the green character of London.
2. Including open air facilities serving the leisure, recreational, sports, arts and cultural needs of Londoners outside their local area.
3. Containing a feature of historic, recreational or biodiversity value of national or regional significance.

Highgrove Woods, a Site of Importance for Nature Conservation, was awarded Silver Gilt and category winner for a Conservation Area in London in Bloom 2014.

Warrender Park, Green Flag holder and was awarded Silver Gilt for Park of the Year London in Bloom 2014, These are the nearest open spaces for Pembroke Park, Warrender Park now has many improved sporting facilities, and is used widely by Bishop Ramsey School, which has a large catchment area and is not confined to Eastcote & Ruislip.

Both Warrender Park and Highgrove Woods, are historically interesting, being part of the former Warrender Family Estate, Highgrove House is still a residential property. [Winston Churchill stayed at Highgrove House during WWII]

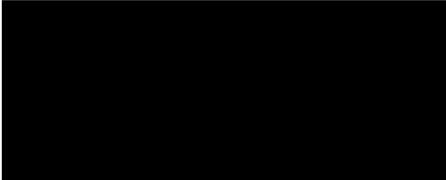
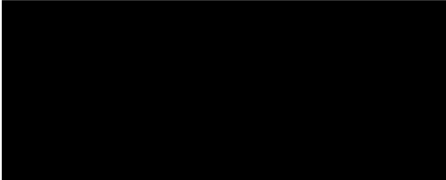
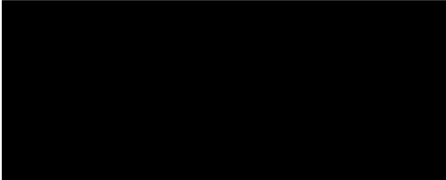
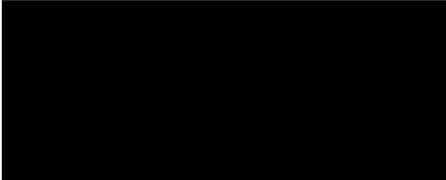
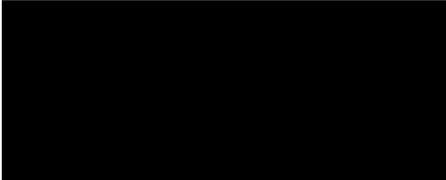
The Hillingdon Open Space Strategy also noted that areas of Cavendish and Eastcote/East Ruislip wards are lacking in open space per capita of the population, which should be increased.

These two areas are a much needed break in the urban fabric, serving leisure pursuits and have great conservation biodiversity value. **Eastcote Conservation Panel request that these two areas are given Metropolitan Open Land status.**

Part A - your details

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Your name and address

Title	Mrs
First name	Jackie
Last name	Redrup
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
--------------------	--

To which part of the Local Plan Part 2 does this representation relate:

Policy number	DME4
Paragraph number	2.29
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input checked="" type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Whilst sound overall, we ask that you consider adding Heritage sites that would enhance this section:-

1. Manor Farm Ruislip - a Grade II listed complex with the Great Barn - one of the largest remaining in the area, Ancient Monument -Motte & Bailey, mentioned in the Domesday Book.
2. Eastcote House Gardens, currently undergoing restoration, Grade II listed Stables Dovecote and Walled Garden. Listed as a Garden of Excellence. The Dovecote is the only remaining Dovecote in Middlesex in public ownership. The Walled Garden, surrounding gardens and park land, with the link to Long Meadow (Northwood Hills Ward), a Conservation site will attract many visitors. The

restoration project includes a new building to house a Tea Room. Visiting excellent gardens is now a growing past time.

Both Manor Farm & Eastcote House Gardens have Green Flags. London in Bloom 2014, Category Park of the Year, Eastcote House Gardens was Gold and category winner. Long Meadow Category Conservation Area was awarded Silver Gilt and category winner. Both sites are linked by the Celandine Route, a 13 mile walk along the Pinn Meadows.

2.29 last bullet point could also be given greater weight.

Policy DME4 statement should state Council's commitment to actively encouraging visitors

Please set out what change(s) you consider necessary In Para 2.29 add both sites above as bullet points.

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In the last bullet point currently, suggest it should read - Many historic features including Ancient Monuments, Grade II listed buildings, gardens, inns, barns and churches.

DME4 could read - The Council will take steps to encourage visitors to Heritage and other sites and will, in principle, support

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DHM6

Paragraph number

4.16

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Again we support the plan but feel the wording in 4.16 and Policy DHM6 should be changed to reflect the wording of the NPPF 53 which is as follows:-

53. NPPF ...Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.....

Planning applications to develop side and front gardens are often submitted. Development of side gardens can drastically alter the appearance and cause harm to the local area.

By replacing the very specific garden location, these unsuitable applications will become easier to resist.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Therefore, rather than referring to back gardens or backland development the policy DMH6 and 4.16 should omit the word 'back'.

Policy DMH6 would then read - There is a presumption against the loss of residential gardens due to the need to.....

No

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Site Allocation and Designations, Green Belt, MOL Green Chains, Nature Conversation Section + Policy DME15

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We are asking that consideration be given to changes to the wording of Policy DME15 to precisely reflect the previously approved Policy EM2.

We also support the submission by Lesley Crowcroft, Eastcote Conservation Panel regarding changing the status of various green spaces in the Eastcote/Ruislip area

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Mrs Crowcroft's representation and suggestions in this regard are attached for your ease of reference.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Mrs Crowcroft has requested that she be able to participate in the oral part of the examination - Eastcote Residents Association do not therefore require separate representation

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Local Plan Green Belt etc - Lesley Crowcroft representation.doc

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number 7.27
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

7.27 on Page 109 states there are 16 Green Flag sites

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

There are 28 covering many different type of open spaces. In fact Hillingdon has the highest number of Green Flags in the Country.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Tables 3.1, 3.2 + Page 29

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We submit that the following corrections are required:-

Initial House, 150, Field End Road, Eastcote, Cavendish Ward the number of dwellings was increased from 42 to 45 as part of the finally approved application

Former RAF Eastcote Eastcote/East Ruislip Ward. Now known as Pembroke Park. The initial approved planning consent was for 385 dwellings as shown on the table. However there have been numerous applications since to increase the density which we believe is now around 400

dwellings - the actual final number would need to be verified by the Planning Department

The following sites seem to have been omitted:-

216 Field End Road, Eastcote, Cavendish Ward 11 flats with 1 ground floor retail unit. Approved at appeal APP/R5510/A/11/2163550

Audit House, 260 Field End Road, Eastcote, Cavendish Ward, change of use from B1 to C3 to create 22 self contained flats - prior approval not required - Application No. 19365/APP/2014/2727

Please set out what change(s) you consider necessary Corrections and omissions as detailed above.

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Objection to Policy DMTC 4 ‘Location and concentration of town centre uses’

1. This objection relates to Policy DMTC 4 which is considered unsound for the reasons set out below. In principle, it is inconsistent with the Framework.
2. Planning policy must be consistent with the principles set out within the Framework. Each policy should “plan” positively for development; be justified; effective; and consistent with the Framework. If any policy that is not compliant with one of these four tests, it cannot be considered sound (see the Framework).
3. We have identified why we consider the policy is not sound having regard to paragraph 182 of the Framework.
4. There is no mention in the supporting text to justify part B of policy DMTC4. Any such policy should be fully justified. We assume the reasoning for limiting hot food takeaways (amongst other uses) is due to healthy eating. Our objection is based on this assumption but we reserve the right to expand on this should the councils indicate another reason to justify the policy.
5. We consider that the policy should be deleted along with the supporting text. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices, nor is there any adequate evidence to justify the underlying assumption of the policy that locating any A5 use in close proximity with schools could cause adverse health consequences or any other negative externalities which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or the absolute ban or significant restrictions within an undefined distance from a school.

The policy is not positively prepared, justified, effective or consistent with the Framework.

6. Policy DMTC 4 will restrict growth and are inconsistent with the Framework.
7. The policy could restrict almost all new take-away (A5) proposals within the borough, thus is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic, environmental and social progress for this and future generations.
8. As worded, the draft policy takes an ambiguous view of hot food takeaways in relation to the proximity of schools. It applies a blanket approach to restrict development with little sound planning reasoning or planning justification. The policy is overly restrictive and not positive in its approach. This is contrary to para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.
9. Thus the policy is inconsistent with para 19 and 21 of the Framework. Para 19 states:

Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

10. Para 21 states:

Investment in business should not be over-burdened by the combined requirements of planning policy expectations

11. Implementing a vague restrictive policy would be contrary to the Framework which seeks to plan positively. Such a policy cannot be considered positive, and such wording should be considered ambiguous.

12. The policy takes a generic approach to restricting the location and does not make explicit reference to the sequential test of A5 uses, rather than the consideration of each application on a site by site basis. Consideration has been given to noise, odour, emissions, safety, security, refuse and parking of the proposed A5 uses.

13. We assume that health was also a factor when drafting this policy. McDonald's has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice and to reformulate products. For example, McDonald's has:

- Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu;
- Completely removed hydrogenated trans-fats from its menu
- Introduced menu board calorie labelling, in addition to the nutritional information provided on its website, trayliners, and packaging
- Reduced salt in Chicken McNuggets (36%), and fries (25%) since 2003
- Reduced fat in milkshakes (34% since 2010), and deli rolls (42% since 2011)

14. In addition, as the Community Partner of the four home nations Football Associations, McDonald's has helped to train and recruit more than 30,000 coaches over the last 10 years. They in turn, have provided more than 2 million hours of free, quality coaching.

15. No impact of the policy has been assessed i.e. what area or percentage of the borough will this impact upon and how will this impact town centres.

16. The policy has a disproportionate effect on land use planning and the economy when taking into account the limited purchases made by school children who may only have the potential to visit A5 establishments at the end of the school day, and only during term time.

17. No consideration is given to the achievement of sustainable development as required throughout the Framework.

18. The Framework cannot be interpreted to allow blanket restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local

plan (and thus by definition its policy) should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required. The presented policy fails the relevant tests.

19. Professor Jack Winkler's research into 'The School Fringe', for London Metropolitan University for instance found that just 3/10 purchases were at A5 takeaways. 70% of purchases within the 400m school fringe were at A1 or A3 units, and his research concluded 'the most popular shop near Urban was the supermarket, with more visits than all takeaways put together'. Whilst these policies do not seek to implement a strict 400m exclusion zone, it should be considered that this policy will have a similar effect and allow officers to use their discretion.
20. The policy does not restrict the majority of new A1 uses within a proximity to schools or sensitive community uses and therefore the sale of food and drink will still occur. There is no evidence to assume that food or drink sold from an A1 shop is any more or less healthy than that available from an A5 use. The planned policy approach is therefore not effective and unjustified. The policy will place a moratorium against certain use classes of development, but will not meet the ambition set out in the policy.
21. No consideration has been given to the potential negative impact that the policy may have on the local community, employment provision or to sustainability. No alternative considerations to this blanket approach have been presented.
22. McDonald's offers a first step on the career ladder, and nationally recognised qualifications which include Adult Certificates in English and Maths; a Level 2 Apprenticeship; and a Foundation Degree in Managing Business Operations. The company therefore plays a significant role improving the skills base of the local workforce, and supporting work-based learning.
23. We have demonstrated above that the policy is not consistent with national planning policy.
24. The proposal does not accord with the "golden thread" running through the Framework which seeks to build a strong competitive economy. The policy potentially stifles economic development and is not consistent with the policy framework.
25. The policy is not supported by the Framework. Indeed it appears that the policy incorrectly interprets section 8 of the Framework - "healthy communities". That section does not refer to or mention dietary choices or takeaways or make reference to medical health. The section only refers to land use planning matters specifically relating to the community, ie social, recreational and cultural facilities. This is later confirmed in para 171 of the Framework. There is no reference to health in the Framework.
26. To class restaurants and hot takeaways, drinking establishments, betting shops, night clubs, casinos, amusement centres and other similar uses as undesirable uses within certain locations should be seen as a restrictive prescriptive form of planning.

27. No mention of the sequential test is made in the policy. The sequential test sets out the criteria by which the merits of the location of an A5 use are to be judged. Proximity to schools is not relevant to the sequential test. Moreover, the proposed policy could potentially restrict A5 uses which would comply with the sequential test, and therefore it will operate in conflict with the Framework.
28. Such a policy conflict is considered inconsistent with the Framework.

Soundness – summary

29. The proposed policies are considered unsound and fail to meet the four tests of the Framework. They are not positively prepared; justified; effective; or consistent with national planning policy. The policies and supporting text should therefore be deleted in its entirety. No alternative wording or alterations can be suggested that would make the proposed policy sound.
30. We reserve the right to expand on, and provide evidence to support the points raised above at any examination in public.

Objection to the supporting text of Policy DMTC 4 ‘Location and concentration of town centre uses’

Para 3.20

31. In reference to the location of town centre uses, para 3.20 refers to ‘certain types of uses can cause detrimental cumulative impacts as a result of their concentration’. This point is contrary to para. 23 of the Framework, which highlights the need for ‘competitive town centres that provide customer choice’.
32. The paragraph should be removed.

Inspectors approach to similar policy elsewhere

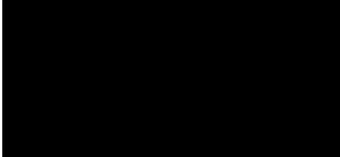
33. We agree with the Planning Inspector’s decision in relation to South Ribble District Council, which proposed ‘400m exclusion zones around any primary, secondary, or special school and sixth form college’. She concluded that:
 - ‘the evidence base does not adequately justify the need for such a policy’
 - ‘Restrictions within the exclusion zones relating to the town, district and local centres only... [are] inconsistent’
 - Due to the lack of information, it is impossible to ‘assess their likely impact on the town, district or local centres’
34. Similarly, in regard to a policy proposed by Newham Borough Council, the Planning Inspectorate called for the ‘deletion of an exclusion zone for A5 use class within 400m of secondary schools. Again, this conclusion was reached because:
 - ‘the policy is not supported by evidence at present’;

35. The Planning Inspectorate had 'strong reservations that the approach to the problem is proportionate, as claimed by the Council'; and
 - 'This part of the policy would be ineffective and therefore unsound'.
36. We feel there are strong parallels with the proposal put forward by Hillingdon, South Ribble and Newham, and call for the deletion of this policy entirety.
37. Whilst it is seen that Hillingdon are not proposing a 400m exclusion zone on health grounds, the proposed restriction on hot food takeaways in proximity to schools is a similar policy and should be removed.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Benjamin
Last name	Fox
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Planware

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
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To which part of the Local Plan Part 2 does this representation relate:

Policy number	DMTC 4
Paragraph number	3
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input checked="" type="checkbox"/> It is not justified
	<input checked="" type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.) See Report Attached

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible) See Report Attached

If your representation is seeking a change, do you consider it necessary to participate in the oral part of Yes

the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To present our case

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Hillingdon Local Plan - Development Management Policies.doc

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Representation to Local Plan

The Douay Martyrs School & land at Glebe Farm

4 November 2014
LB Hillingdon

Section	
1	Introduction
2	Site Description and Surroundings
3	Planning History and Existing Uses
4	School status and evidence
5	Alternative sites
6	Assessment of Proposed Development
7	Development Plan Planning Policy Overview + Planning Obligations
8	Green Belt Assessment
9	Conclusion
	Appendices
1	Site Plan
2	Hillingdon Primary School pupil planning data

Douay Martyrs School & Land at Glebe Farm

Introduction

This representation has been prepared on behalf of the Governors of Douay Martyrs School, the Roman Catholic Diocese of Westminster and the Trustees controlling Guys Investment Limited. This representation concerns the creation of a revitalised, single-site Douay Martyrs School, complimentary community facilities and the required enabling development.

The land referred to as Glebe Farm in previous representations, is owned by the Guys Investment Trust and outlined in red on the plan to the left. Acknowledging the current greenbelt designation of this land, the scheme seeks to retain the element of the land that contributes most to the green belt (the southern portion), increasing the amenity for the local community. It will be respectful of the adjacent scheduled ancient monument and will enhance community access to this local asset. It then enables the creation of a new single-site Douay Martyrs School, through re-provision of the new upper school facilities (freeing the western Long Lane site for enabling development) and crucially enabling redevelopment of existing facilities on its main campus. The scheme can further assist the borough-wide pressure on pupil places by a 2FE expansion. An element of enabling development is required to fund this venture but the degree of this needs to be determined as it would be inappropriate to establish such elements without the community consultation vital to ensuring a balanced approach.

Background

The application sites are sited on or near Long Lane in Ickenham. The Douay Martyrs School campus consists of two sites - Arrowsmith Campus (main school site) and Cardinal Hume Campus – split by Long Lane this provides a historical, current and future safety issue, as well as providing an insurmountable challenge to the provision of an outstanding education for students – as acknowledged by Ofsted in 2005, 2008 and 2013. While the Governors of Douay Martyrs School are responsible for the delivery of education, the freehold remains with the Archdiocese of Westminster. The school has been situated here since the 1930's with minimal investment since the major rebuild in the 1960's.

The Land at Glebe Farm is owned by Guys Investment Limited, a family Trust historically associated with Ickenham. This site is within the designated Green Belt.

This representation aims to promote debate around the challenges faced by the Hillingdon community in providing the optimum facilities for its citizens. This representation will table evidence in terms of the demographic challenge faced across Hillingdon at Primary and Secondary level plus the pressure on pupil spaces (Catholic and non-Catholic) in West London. This representation will indicate the lack of alternative sites suitable for education purposes acknowledged by Hillingdon through its own assessment and Local Plan endeavours. Ultimately, this representation will justify that Hillingdon deserves education facilities that are sized accordingly, fit-for-purpose, safe and most importantly acknowledged as an outstanding education environment. Hillingdon demands community amenities that are accessible to all with facilities that promote enhanced usage with all the attendant benefits they generate.

Douay Martyrs School & Land at Glebe Farm Site Description and Surroundings

Site Description



Redevelop main school campus

Enhanced drop-off/pick-up

New school link across railway

New upper school facilities

New community green space

Enhanced access to Ancient Monument

Retained and Enhanced green belt

Enabling development sites

Site Surroundings

The site is bounded to the west by the London Underground line running from Uxbridge to central London with the secure fence line being maintained by LTU along with those trees forming that boundary line. To the north the development of Glebe Farm circa 1950's was made into the existing Clovelly Avenue and Clovelly Close cul de sac off Glebe Avenue. To the east the site is bounded by Burnham Avenue developed in the 1940's, and further bounded by the western edge of the moat of Ickenham Manor farmhouse, and to the south the field is bounded by the unmade track that services both Long Lane Farm and the house of Manor Farm.

The local moat of Ickenham Manor – one of the drain's purposes was to drain the land upon which the house and outbuildings stand - surrounds both the farmhouse and the 'playing fields' of the Douay Martyrs School. The closer moat was probably dug at the time of the farm construction, and the outer moat was perhaps a cattle enclosure, drained by that outer moat to render it suitable for grazing. The wet Ickenham Marsh lies close by to the eastern edge of the farm buildings illustrating what the land would have been like if left un-drained.

The Ickenham Manor moats have English Heritage notice boards explaining their history and significance but the moats themselves are not currently accessible to the public, and there is no 'through link' from this track/path to the nature trail to the east that runs by Ickenham Marsh up along the Austin's Lane Trail.

Current owners

The current freehold owner's of the field is Guys Investments Limited, which is within a family Trust based and governed in Guernsey. The Trustees fully support the donation of the land to the Diocese of Westminster in order to benefit the Academy and local community so that an exceptional educational case can be submitted to the LB Hillingdon 2012 local plan (part 2) for inclusion.

Land Registry documentation

The Official number of the registered title is MX 77304 and was updated on 21.08.2013 to reflect the correct boundaries of the freehold land first entered in the register on 18.01.1938, and in addition specifying the new address of the proprietor. In addition, the land has specific rights allocated to the transmission of electricity distribution – in that there are a wayleave for a proposed electricity sub station to the eastern boundary foot path entrance, and an underground power cable running to the field from under the railway line at the bridge crossover location. The stiles for the right of way have been renewed in the past 2 years and the rights of the landowner have been established with regard to the private and restrictive access to the site under the current legislation. These have been registered with LB Hillingdon.

The following plan is attached in Appendix 1:

Copy of drawing showing the Right of Way and fence lines

Douay Martyrs School & Land at Glebe Farm

Planning History and Existing Uses

Site and Planning History

The two fields are some 15 acres remaining of the 1382 acre Swakeleys Estate that was auctioned off in July 1922 and represent the last part of the five lots, mainly awkward pieces of fields which were cut off by the newly built railway line, that were advertised at that time as building land.

The estates nine farms were mainly sold off in their entirety including Long Lane Farm bought by Mr Edward Dalton, and Ivy House Farm, Milton Farm, Church Farm and Glebe Farm which were purchased by West Middlesex Development Company, who had entered an agreement with Uxbridge Urban District Council in 1927, to develop the Ivy House Farm estate in accordance with the principals of a Town Planning Scheme then being prepared by the Council. Both Milton Farm and Glebe Farm continued as farms for some years, though with depleted amounts of land. By 1937 the Reverend Guy had acquired them and in 1939 the Ickenham Garden City in conjunction with the District Council was begun. The City development was halted during the war years and then completed soon thereafter on a reduced scale although the existing Milton Court and surrounding housing and roads illustrate the innovative and modern style of housing development then completed in conjunction with the Uxbridge District Council. In addition, it is noteworthy that the 'existing large green open space' of Milton Court was donated by his brother Mr Waldo Guy to the Ickenham residents as a 'free open community space' for the relaxation and enjoyment of the residents.

The farm land that was not used due to the 'austerity measures of the 2nd World War' for the Ickenham Garden City were then placed into Trust and the remaining parcels of all that land are these fields owned by Guys Investments Limited under Trust ownership for the surviving family beneficiaries of the late Reverend Guy and his brother.

In the late 1940's plans were drawn up for a major housing estate in Ickenham to the east of the railway line replete with houses, schools, cinema and shops. Both Burnham Avenue and the Glebe Primary School were built at this time and some of the land became part of the Middlesex Green Belt. In the 1950's houses were still being built in Clovelly Close and Clovelly Avenue, which was the site of Glebe Farm. Indeed Clovelly Avenue terminates abruptly at the site boundary. The public highway, associated footpaths and utilities and services are all terminated in anticipation of further residential development southwards into the Glebe Farm fields. The Glebe Farm 'home' grazing fields are the fields associated with this Representation on behalf of the three parties.

At the time of the Borough of Hillingdon's Unitary Development Plan – draft 1993 representation was made by the Trustees to permit a relaxation of the Green Belt status to accommodate a re-development of the Douay Martyrs School in order that the school could expand and cater for the rising number of children within the school's catchment area. The Trust in conjunction with the School head – Lady Stubbs - presented to the Inquiry and whilst the Inspector both commended and supported the re-development scheme he was unable to 'rule' on the submission as it fell outside the specific remit of the inquiry.

Previous plans for fields

During the period of the Unitary Plan's development the school applied for temporary classrooms which was deferred, and the Trust itself received an offer to purchase the 'Fields' for use as an educational expansion and re-siting of the Douay Martyrs School on a single site by the Hillingdon Council itself. In the years following the Trust

also received another request from the Diocese of Westminster to use some of the land to develop and expand the school due to cater for the intake of pupils, and to resolve 'wasted educational time' by making the scheme more efficient.

Following the Unitary Plan presentation and in the later 1990's further reviews of the fields and how they could be used under 'exceptional circumstances' were investigated both by the Trust and the school. In addition the school undertook 'land' searches within the local area to find an alternative site and the last of these 'joint approaches' failed to become viable in 2012 to the developer on the Hillingdon Circus site.

During the whole of this period – 1991 through to 2010 – the Trust has taken a supportive role to the school – now an Academy – to both donate and provide adequate land within the field site for the development of a single site new school/academy for the benefit of the community. The School Governors have continued to search for or join a developer on another site but these attempts have failed due to the 'cost to the Diocese' of the land required and the associated costs of re-building. A number of temporary alternatives have been implemented during the period including a second site on the opposite side of the road, an expansion of classrooms on the main site, and a re-allocation of playing fields and space for the pupils around the Ickenham Manor. However, all these changes have not resolved the main issue in that the academy cannot 'expand' pupil numbers or 'grow' the educational benefits to pupils on the existing sites due to site constraints, an inability to make the two site location more efficient, and is unable to achieve standards of educational excellence for pupils with the restrictive loss of teaching time and 'educational wasted time' due to pupils transferring themselves from one site to another.

Since 2010 the Trustees have become more pro-active in renewing their attempts to assist the Academy and the Diocese to re-solve all the issues in providing 'educational' land at no cost, financial support to unlock the potential of the existing school sites, and to achieve a resolution of this community issue that has remained unresolved for over 30 years.

Existing Uses

The 15 acres are designated as a registered agricultural holding and the southern portion of the land is currently being used for grazing purposes, leased on an annual basis to the Dalton Family Trust of Long Lane Farm. It should be noted that while there is relatively unfettered public access to the northern portion of the site, this at the benevolence of the landowner

Douay Martyrs School & Land at Glebe Farm School Status and Evidence

This section of the representation is seeking to address the well-known challenge across London in terms of Pupil Place Planning.

Demographic Influences

The 2014 secondary school admissions cohort commenced compulsory schooling in September 2007. Since that date there have been two significant developments effecting access to education:

- The rapid expansion in the primary sector that has been required in order to supply sufficient school places for primary school aged children (evidence included in Appendix 2)
- Changes within the European Union that have resulted in a significant increase in number of Catholic Families choosing to settle in the United Kingdom

During the last 5 years, the number of places in Catholic primary Schools in Hillingdon has remained unchanged at 330. However, within the authorities listed above, more than 300 places per year (10 forms of entry) have been supplied in areas that are close to the borders of Hillingdon. This will result in greater demand for places at those named schools. With most governing bodies using distance as the determining factor for managing oversubscription, the net results is that the catchment area for each secondary school will reduce. The impact for Hillingdon and Hillingdon Catholics in particular will be significant.

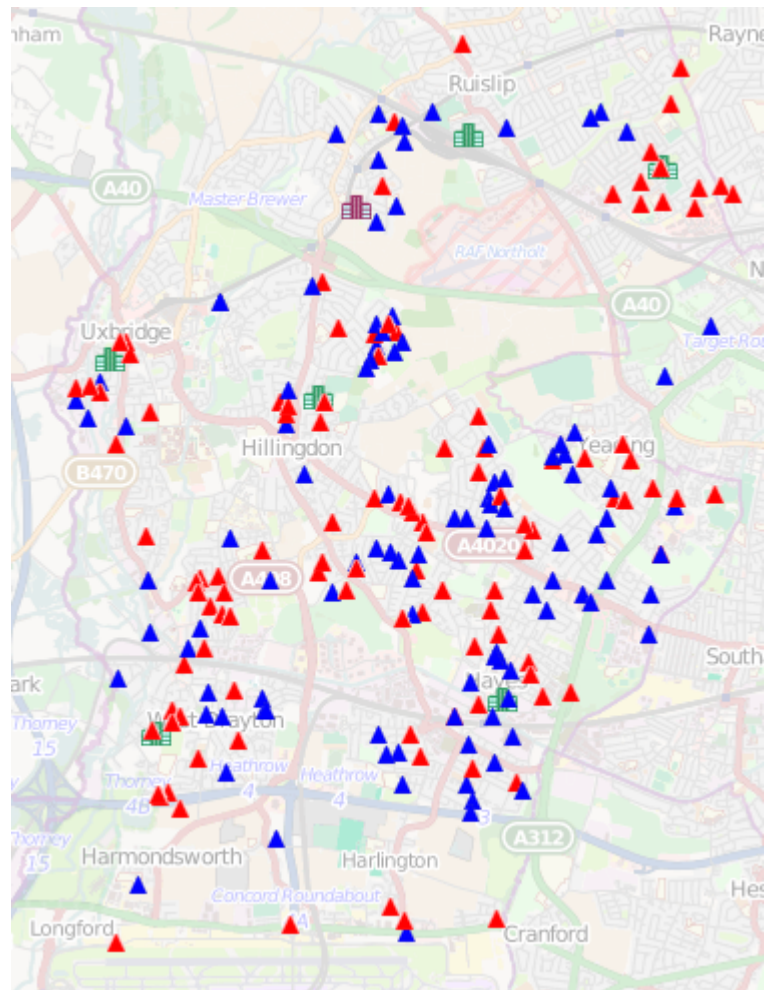
Douay Martyrs is the only maintained Catholic Secondary school/academy operating within the LB Hillingdon. Situated in just north of the A40 in Edinburgh Drive, Ickenham, it attracts most of its pupils from within the Borough. On the map to the right, Douay Martyrs is represented by the maroon building symbol situated to the north-west of RAF Northholt. The six green building symbols represent the 6 Catholic Primary Schools in Hillingdon. The red triangles represent Catholic pupils and the blue triangles, non-Catholic pupils.

It is clear from the evidence depicted, that the vast majority of successful applicants to Douay Martyrs come from within the Borough of Hillingdon.

In September 2014, Douay Martyrs admitted: the following student profile:

Catholic Pupils:	126
Non-Catholic Pupils:	114
Total:	240

The planned admission number for Douay Martyrs is 240, therefore the school is full.



In selecting a secondary school for their child, some parents chose to send their children to Catholic Secondary Schools in neighbouring local authorities. In September 2014 children resident in Hillingdon were enrolled at the following out of borough schools:

- Hertfordshire
 - St Joan of Arc, Rickmansworth
 - Loreto, St Albans (Girls)
 - St Michael, Watford
- Harrow
 - Salvatorian (Boys)
 - Sacred Heart Language (Girls)
- Ealing
 - Cardinal Wiseman
- Hounslow
 - St Mark
 - Gumley House Convent (Girls)
 - Gunnersbury (Boys)
- Kensington and Chelsea
 - Cardinal Vaughan Memorial School (Boys)
- Hammersmith and Fulham
 - London Oratory (Boys)
 - Sacred Heart (Girls)

For some parents, the choice was based on Gender (8 of the 12 schools listed above cater for single sex cohorts). For others, location and proximity may have been influencing factors.

Forecast for Douay Martyrs

In September 2021, the cohort that has just started primary school (in 2014) will be attending secondary school. Unless there are significant changes in the demographic trends in the Borough, almost 400 Catholic residents of the Borough, will be starting secondary school. Unfortunately, if Douay Martyrs remains unchanged, only 240 of these children will secure places at the school. The remaining 150+ children (5 forms of entry) will accept places in other secondary schools within the borough and potentially displacing other residents for whom those schools would have been their preferred option.

This situation will be further exasperated by the displacement of those Non-Catholic children who are currently able to secure places at the school. This number currently stands at 114 pupils (4 forms of entry). They too will be seeking placements in the Hillingdon Community Secondary Schools.

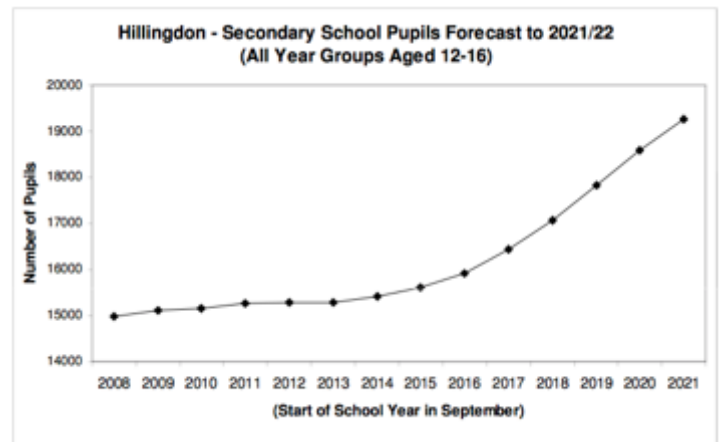
Therefore, in total, the Local Authority will need to provide a Community Secondary School with the capacity to admit 270 pupils per year (9 forms of entry) just to cope with the projected displacement caused by this one Catholic Secondary School.

LB Hillingdon evidential support

Through its own School Places Planning Update (2013-2022) presented at the 25 July 2013 Cabinet, LB Hillingdon has highlighted the real challenge presented by the current pupil school forecasts. The salient points are:

- Pressure is predicted in 2016/17 at secondary level due to the multiple influences at primary level as stated in the report, “an additional 3,150 primary school places over next ten years over an above the existing successful schools expansion programme;

- Predictions from the Greater London Authority indicate the number of secondary pupils in Hillingdon is set to increase by 25% (an extra 3,900 pupils) to more than 19,000 between September 2012 and 2021/22. The rate of increase is faster for year 7 pupils (the entry year into secondary schools) as the growth in primary pupils moves into secondary education. This is consistent with the increase in primary pupil numbers and similarly is concentrated in the south/south-east of the Borough (the main catchment area within Hillingdon for The Douay Martyrs School). In the medium-term there are



sufficient secondary school places however, the pressure for secondary school places is expected to begin from the year 2016/17 onwards and will lead to a need to provide an additional 16 forms of entry for secondary school places in the Borough. Which given planning and building timeframes of circa 4 academic years for a large secondary school, suggests actions needs to be taken now;

- Since the update to Cabinet in April 2013 officers have been in discussion with the Head Teachers of secondary schools in the Borough to establish what their plans are for developing their school and to undertake an outline appraisal of existing school sites to assess the potential for expanding the provision of school places. Officers have been exploring opportunities to expand existing secondary schools in the first instance given the significant land required for a typical six form of entry secondary school to meet prescribed school standards e.g. space for playing fields. Typically the size of site required for a school of this size is approximately six hectares – please refer to site search conducted by stakeholders on section on alternative sites;
- All of these localised ‘Hillingdon factors’ are compounded by the popularity of Catholic schools, with immigrant parents from Eastern Europe and the ripple out from now significantly oversubscribed, redeveloped catholic schools such as Cardinal Wiseman in Ealing.

All of the above points to an overwhelming need to assess the full merits of each and every proposal to build capacity, particularly at well established, well regarded schools. That is even before we address how will this programme be financed. Our proposal aims to be at zero cost to the public purse, an approach that LB Hillingdon itself welcomes and can embrace:

“The current Primary Schools Expansion programme factors in £63.6 million of DFE grant and £16.7 million of S106 resources. The balance of £69.4 million is being resourced from a combination of borrowing and capital receipts from disposals of council assets. Further increase in a Council led build programme for further schools expansion would require a significant increase in borrowing with associated revenue cost implications. Therefore a strategy that looks at partnership would potentially mitigate the further impact on council resources.”

“Pursuant to section 14 of the Education Act 1996 the Council has a statutory duty to ensure that sufficient school places are available in its area for providing primary, secondary and special education. Further, by virtue of Section 1 of the Localism Act 2011 that makes provision for ‘a general power of competence’ for local authorities in England. The ‘power’ gives local authorities the power to do anything an individual can do unless specifically prohibited by law. This includes the power to act in the interest of their communities.”

Douay Martyrs School & Land at Glebe Farm

Alternative Sites

This representation has sought to demonstrate the extensive works undertaken in looking at a viable solution for The Douay Martyrs School, works that through various policy and government funding cycles has been ongoing for over 20 years. The stakeholders instructed an analysis of the available options:

1. Expansion on the existing site
2. Relocation to a site outside of LB Hillingdon but within Diocese acceptable parameters
3. Sites available within LB Hillingdon

1. Expansion on the existing site:

The twin sites of the existing school are already over developed and under capacity (on current intake at Governors interim agreement – notwithstanding current policy on staying on levels post 16). Whilst an expansion of the school on its existing sites is technically possible, LB Hillingdon would have to:

- i. Consent to buildings of significant height and density ratios that transgress policy in an area that comprises of mainly residential housing;
- ii. fund the demolition and rebuild of the whole school;
- iii. arrange for the school to be accommodated in temporary facilities for the 24 – 30 months required to complete the work
- iv. address how the school's buildings (that are on two sites separated by a busy main road) become viable in the future – all facilities cannot be accommodated on one site; As Ofsted have frequently commented this factor 'affects punctuality to lessons as well as presenting difficulties for the school and the students'.
- v. Note: During LB Hillingdon's own representations for Lake Farm school, it stated "it is considered that ideally a school would not be split from its playing fields by a busy road. Given the unique opportunity the Council has to provide a brand new school, built to current modern building practices and guidelines, the provision of a split site school for such children, divided by a busy road, is highly undesirable."

Outcome: This is not a realistic option as its impact on educational standards is unacceptable.

2. Relocation to a site outside of Hillingdon:

Whilst it might be possible to find a potential site for the school outside of the Borough, if relocated, it could not continue to serve its current communities and feeder primary schools. In reality, the school would fill with Catholic children but these children would be from the area immediately surrounding the new site. The supply of places for Catholic residents of Hillingdon would be significantly reduced, severely limiting the options of a significant portion of the electorate.

Outcome: This is not a realistic option as the Diocese and school are committed to serving the community of Hillingdon and supporting all LB Hillingdon efforts in addressing the demographic pressures faced.

3. Relocation within LB Hillingdon:

Based in Ickenham, Douay Martyrs is reasonably accessible to Catholic residents throughout the Borough. The original siting of Catholic Secondary Schools, by the Diocese of Westminster, was planned to ensure that every school had a strong catchment area whilst offering parents a certain amount of choice. As determined by those who established the school in the first place, if the school is to be relocated within the Borough, it will be necessary

to identify and secure a suitable site within 1 mile of the current school. Furthermore, public transportation must be equal to or better than those servicing the existing site. Cycling options must also be viable.

Outcome: The preferred solution subject to available site against criteria outlined below

The Site Selection Process

In view of the above, a sequential assessment has been carried out that identifies sites within and close to the area of greatest need, of sufficient size to accommodate the new school and reasonably available to the Council (as the body with responsibility to purchase land for educational purposes).

The site search sought to identify suitable sites in planning terms, but also taking into consideration educational requirements, for the provision of a new ten-form of entry secondary school within the Hillingdon area. Essentially, the primary criteria in selecting sites suitable for the new school were to identify: sites of a sufficient size; sites which would allow the greatest numbers of staff and students to walk, cycle or use public transport to get to the school, rather than car; sites which were reasonably available within the time and budgets available to the Council; and sites which were most appropriate from a planning perspective.

Taking into consideration the geographical area within which the new school is required, and following a review of the adopted and emerging Local Plans, discussions with Council Officers, a desk based assessment and an 'on the ground' analysis of potential locations, only two sites have been identified, where there could be potential to provide a school. Once identified these sites were assessed against a basic set of criteria, including the following (in no particular order of importance):

- i. Location
- ii. Size and physical constraints
- iii. Accessibility
- iv. UDP designations
- v. Availability

i. Location

The location of the school site is an important factor to not only ensure that it appropriately serves the area of greatest need but to also ensure the long-term success of the school. In determining the location, sustainability has been an important consideration. Schools are major generators of traffic and, as such, it is vital that they are located so as to maximise their accessibility by walking, cycling and public transport. This has been a significant factor in determining the appropriateness of sites. Notwithstanding the above, there are a number of factors that can influence the location of the site and it is important that a balance is struck between all relevant criteria.

ii. Size

The size of the site is a critical factor in determining its suitability for a secondary school. The Education (School Premises) Regulations 1999 - enshrined in Guidance BB98 and updated in BB103 (secondary) - sets out specific requirements for school premises. A school to accommodate circa 2,000 pupils (ten form of entry plus 100% staying on rate in sixth form) would require the following allowances – demonstrated against the current arrangements:

Building	Current	BB98	BB103 (S)
Pupil numbers	1,680	2,100	2,100
Total net building area	9,040	11,170	10,473
Total gross building area	11,752	15,920	15,230
efficiency - footprint	tbc	6,368	6,092

Site area	Current	BB98	BB103 (S)
Net site area	54,340	111,700	56,800
Confined net site area	n/a	11,200	tbc
usable site area external	-	-	-

By the latest school regulations, BB103 (secondary) circa 15,000 m² of floorspace plus circa 50,000 m² for external areas (inclusive of playing pitches, (grass) informal play areas, hard surfaces for games courts, hard-surfaces for informal play areas and habitat areas. Based on these factors and to provide flexibility over site layout and even allowing some efficiency in building footprint (by averaging 2.5 stories across the development) and the need to provide appropriate access, parking and landscaping, a minimum site area of approximately 5 hectares is required.

iii. Accessibility

The selected site should have good accessibility for pedestrians, cyclists and those using public transport in order to reduce dependency on private car use and minimise the impact of the development on the surrounding highway network and local air quality. The school will have a Green Travel Plan which will encourage use of sustainable modes of transport, walking and cycling to school, car sharing schemes, etc, and, as such, it is important that the school is located within a convenient walking and cycling distance from the greatest number of pupils possible. Furthermore, the Council is required to make transport arrangements for pupils who cannot be offered places within reasonable travel distance of their home address (and, as such, financially, it is not viable to locate the school too far away from the majority of pupils likely to attend it.

iv. UDP designations

In reviewing the appropriateness of any site due regard must be given to relevant policies and designations as set out in the Hillingdon Unitary Development Plan Saved Policies (September 2007) and updated policies contained within the 2012 Local Plan. In this case, the site selection, based on UDP policies, would have the following order of preference:

Existing school sites

Brownfield land

Land designated for other uses (i.e., housing, industrial, etc)

Green Belt

In addition to the specific site designations, constraints such as flood zone, the location of high quality trees, proximity to and potential impact on listed buildings, etc, also heavily influence the site selection.

v. Availability

The proposed school must be delivered to a programme driven by the demographic challenge and other condition driven factors and within budget and, as such, the availability of sites to the Council is also an important consideration in determining their feasibility as a site for the school.

Where a privately owned site was considered it was vital that this could be made available within a timely manner and at a reasonable cost. There is concern that, given the timescale in which the new school must be delivered, the current very dynamic residential market, competition and timescale of land transactions could significantly complicate and delay the delivery of the school.

The two sites that emerged were:

1) Former Master Brewer - Hillingdon Circus site

This site emerged as a credible alternative for a school when assessed against criteria i. through to iii., albeit LB Hillingdon acknowledges in its own assessment of this site that a significant objection was the impact a current application would both have on traffic and pollution. The area is an Air Quality Management Area that means with even current traffic levels it's already exceeding the pollution quotas for the European Union. Further concerns were raised about: " The longer it takes people to cross a road the more likely they are to ignore the traffic light system and cross when they see a chance, not when the light turns green. That could be very dangerous - especially for young children."

In terms of criteria iv., its designation is 'Land designated for other use' and unfortunately LB Hillingdon has recently resolved to grant permission for a mixed use Retail, Hotel and Residential development. This recent approval hence negates criteria v. from being an influencing factor as the owner is developing out.

2) The Douay Martyrs School own site in conjunction with adjoining land at Glebe Farm

This site emerges as the most credible alternative and only real viable option as it scored very favourably on criteria i. through to iii. On criteria v., it also scored heavily as the landowner has positively been supporting any school development scheme for the past 20 years and is happy to implement immediately, post the appropriate statutory approvals being in place. As indicated by the preference on standings the significantly larger portion of the school would be on existing designated (D1) non-residential institution land. The smaller proportion of the school will be on the Green Belt designated land at Glebe Farm. Notwithstanding this statutory obstacle, the benefits of creating a single site Douay Martyrs campus including their playing fields have outstanding education possibilities.

The stakeholders resolved to endorse the Douay Martyrs School own site in conjunction with adjoining land at Glebe Farm option as their favoured solution and approach LB Hillingdon and the community as appropriate. It was further determined that elements of enabling development should be considered in order to provide a 'zero cost to the public purse' solution as well as significantly reducing the land cost to the Diocese or Academy itself.

Douay Martyrs School & Land at Glebe Farm

Assessment of proposed development

This proposal is for a mixed-use development across the main Glebe Farm site but linked to the two existing Douay Martyrs School sites. The current stakeholders would like to stress the point that these are proposals based on current assumptions on demand validated by the relevant bodies i.e. pupil numbers, but without community consultation. A high degree of certainty exists that there will be support for the school elements given their large school community and previous endeavours but it is acknowledged that development of the other elements demands consultation with neighbours, local interest groups and statutory bodies.

The elements to the scheme are that are directly relevant to this representation to the local plan relate to the land at Glebe Farm:

1. Retain and enhance the southern portion of the Glebe Farm estate for the community and school to enjoy. Amenity to be increased through consultation. Note: no public access to this area at present;
2. Enhance access and interpretation to Scheduled Ancient Monument – Ickenham Manor Moat;
3. Establish new upper school facilities for The Douay Martyrs School by provision of new circa 3,800m² facility. Sensitively designed and sustainably developed it re-provides all the current accommodation from the Cardinal Hume campus currently on west side of Long Lane; and
4. Enabling development to north part of the Glebe Farm – respectfully designed given neighbours and sustainably developed, this will provide the necessary funds to make the scheme work.



By the nature of this scheme, 'Linked' sites are created by the scheme at the heart of this representation:

5. To ensure that The Douay Martyrs School is designated a single site access is created across the railway line for school use only. The exact balance of accommodation on existing site and new site needs to be determined but this crucially gives the school 'churn space' to do so effectively and at minimal disruption to the education standards;
6. Redeveloped main Douay Martyrs campus on Long Lane east, with enhanced drop-off/pick-up space to ease congestion on Long Lane; and
7. School campus on west side of Long Lane is released for enabling development.

All seven elements highlighted above will be evolved through the consultation process.

Douay Martyrs School & Land at Glebe Farm Green Belt Assessment

Within this section, we assess the component parts of the proposed development alongside Green Belt (GB) policy contained within local, regional and national planning policy.

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007) (UPD)

UDP policy OL1 defines the types of development considered acceptable within the Green Belt. These are predominantly open land uses including agriculture, horticulture, forestry, nature conservation, open-air recreational activities and cemeteries. It states that planning permission will not be granted for new buildings or changes of use of existing land or buildings that do not fall within these uses.

Policy OL2 states that, where development proposals are acceptable within the Green Belt, in accordance with Policy OL1, the Local Planning Authority will seek comprehensive landscaping improvements to enhance the visual amenity of the Green Belt.

Local Development Framework

The London Borough of Hillingdon is currently in the process of preparing its Local Development Framework. The Core Strategy was submitted to the Secretary of State in October 2011 and an Examination in Public commenced in March 2012. Accordingly significant weight can now be attached to this document, given its advanced stage in the planning process.

Policy EM2 confirms that any proposals for development within the Green Belt will be assessed against national and London Plan policies, including the very special circumstances test.

Notwithstanding this, paragraph 8.27 states that "in very exceptional circumstances the Council will consider the release of Greenfield sites for schools."

Regional Policy Guidance - The London Plan (July 2011)

London Plan policy 7.16 reaffirms that the "strongest protection" should be given to London's Green Belt, in accordance with national guidance, and emphasises that inappropriate development should be refused, except in very special circumstances.

National Policy Guidance - National Planning Policy Framework (NPPF)

The NPPF makes it clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It states that:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations."

In the GB there is a presumption against inappropriate development. Paragraph 3.4 of PPG2 clarifies that the construction of new buildings in the GB is inappropriate unless it is for certain purposes defined by that paragraph. Based upon this, the buildings that are associated with certain uses are considered an appropriate form of

development, whilst any residential buildings are inappropriate. Consequentially these two distinct uses raise different Green Belt policy issues.

Before considering the acceptability in Green Belt terms of the proposed development we firstly consider the value of including land within it.

Assessment of how the existing site contributes to the purposes of including land in the Green Belt

PPG2 identifies that there are five purposes of including land in Green Belts, these being to:

- i. check the unrestricted sprawl of large built-up areas;
- ii. prevent neighbouring towns from merging into one another;
- iii. assist in safeguarding the countryside from encroachment;
- iv. preserve the setting and special character of historic towns; and
- v. assist in urban regeneration, by encouraging the recycling or derelict and other urban land.

The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over any land use objectives. We assess below how the site currently contributes to achieving these purposes and how this will be affected by the proposed development.

i. check the unrestricted sprawl of large built-up areas

There are two distinct parts of the site. The northern part is bordered to the north and east by a residential neighbourhood. To the west is the Piccadilly/Metropolitan line. To the south is a boundary hedgerow to the southern part of the site. Hence, on three principal boundaries it has an already established urban character. The southern part of the site is bordered to the east by the current Douay Martyrs School playing fields. To the south and west it is bordered by open space that is pre-dominantly being used for agricultural purposes, broken only by the odd farm building and boundary hedgerows.

The northern part of the site is accessed from the end of Clovelly Avenue, a boundary that will not become any less defensible as a result of any potential development. Indeed, this proposal to split the site the site into the northern and southern sections will create an enhanced, southern defensible boundary.

As described above any variation on a masterplan layout will result in development being located solely in the northern part of the site that already has an urban character and appearance, with green belt complimentary uses on the southern part only. On balance, there is a positive impact. In addition, as the southern part of the site will not be removed from the Green Belt were this development to be implemented, the local planning authority would maintain planning powers to resist future inappropriate development both on this site and adjoining Green Belt land in the future.

ii. prevent neighbouring towns from merging into one another

The site does not sit between neighbouring towns as clarified by the previous LB Hillingdon Local Plan review 2006.

iii. assist in safeguarding the countryside from encroachment

In terms of encroachment there are two main issues. Firstly, in terms of its visual impact on the wider open countryside and the impacts of the proposals on this. Secondly the impacts of the proposals upon the openness of the site.

As indicated previously, this proposal seeks to safeguard that part of the site (southern portion) that enhances the overall open countryside character in this area, extending the public access to 'around the moats' of the Ickenham Manor, and seeking linkage to the Austin's Lane Trail thence through to the River Pinn public access areas.

Openness – in terms of policy, openness is governed by:

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007) (UPD) Policy R4 seeks the protection of open space stating:

"The Local Planning Authority will not normally grant planning permission for proposals which involve the loss of land used (or where the last authorised use was) for recreational open space (including publicly accessible open space and playing fields, private or school playing fields, private or public allotments), particularly if there is (or would be) a local deficiency in accessible open space."

Local Development Framework Policy EM4 of the Core Strategy states that the Council will "safeguard, enhance and extend the network of open spaces" and that "there will be a presumption against any net loss of open space in the Borough." Development proposals should address local deficiencies.

Regional Policy Guidance - The London Plan (July 2011) London Plan policy 7.16 reaffirms that inappropriate development within London's Metropolitan Open Spaces should be refused except in very special circumstances:

"The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable in they maintain the openness of MOL."

Policy 7.18 reiterates that the loss of open spaces must be resisted. Where the loss of open space is proposed it should be replaced by equivalent or better quality space within the locality and that the replacement of one type of open space with another will not normally be considered acceptable.

National Planning Policy Framework (NPPF) Paragraph 74 of the NPPF reaffirms that the strongest protection should be given to preserving open space:

"Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

As indicated, this representation seeks to establish debate around what the community wants for this space. It is currently only accessible at the benevolence of the landowner and tenant. The loss resulting from the proposed development would be replaced by:

- equivalent or better provision in terms of quantity and quality in a suitable location;
- the development is for alternative sports & recreational provision and greater public access, the needs for which clearly outweigh the loss.

Openness is a distinctly separate test to visual impact in that it relates to the amount of built form as opposed to whether you can see it. To assist in further assessment an analysis of the site and its surrounding landscape context will be undertaken and a number of visualisations prepared from locations agreed with the local planning authority.

Effect on Landscape Character More Generally

Mindful of all the above, it is necessary to consider how 'character' in the landscape context is understood and the effects of the development upon it. Character is about more than what can be seen: it is a function of land use and

the consequent effects of those uses, for example lighting, traffic, landscaping and noise. Thus it is the product of a general awareness and understanding of how an area is structured.

Visualisations can be prepared to allow an impression of the scheme to be appreciated from a representative sample of publically accessible viewpoints. These are aids to the visualisation process but it is accepted that the wider landscape effects cannot be encapsulated by a single visual image, because viewers are not 'parachuted' into a viewing position. Thus most people who move across an area have in their mind an understanding of the broader pattern of uses even when they do not see them directly. This sense comes from memory, from the experience of an area.

In this broader understanding of landscape character and effect it is our view that the proposed development would have a substantial beneficial effect. As well as this quantitative benefit there are significant qualitative benefits in the form of the delivery of attractive landscaping (hard and soft), enhanced ecological/biodiversity potential, greater visual and physical links through the site (thereby improving permeability) and the delivery of innovative and high quality architecture. These are a demonstrable and substantial improvement upon the existing situation that actively detracts from the character of the Green Belt and visual amenity of the area. The application proposals will therefore integrate in a more appropriate, and in our view successful, manner with the surrounding landscape context.

iv. preserve the setting and special character of historic towns

There are no historic towns in the immediate vicinity of the application site and as such this purpose is not relevant to this application, as clarified in the previous LB Hillingdon Local Plan review 2006.

v. assist in urban regeneration, by encouraging the recycling or derelict and other urban land

The site was not assessed as assisting in urban regeneration by the previous LB Hillingdon Local Plan review 2006.

Nevertheless, as demonstrated above, when assessed against the purpose of including land within the Green Belt this site serves very limited 'purpose'. Consequently the proposed development would not compromise the purposes of including land in the Green Belt in this location. Instead we consider that the site will, as a result of this development, contribute more positively to the purposes of including land within the Green Belt. In addition to delivering a wide range of other benefits. Furthermore, the proposed redevelopment of this site will not necessitate the sites' deletion from the Green Belt ensuring ongoing policy protection over any future development proposals.

Educational facilities:

The following policies, which encourage the provision of new and/or enhanced educational facilities, are also of relevance:

Local policy - The Hillingdon Unitary Development Plan Saved Policies (September 2007 (UDP) Policy R10 seeks to encourage the provision of enhanced educational facilities across the borough, stating:

"The Local Planning Authority will regard proposals for new meeting halls, buildings for education, social, community and health nurseries, including libraries, nursery, primary and secondary school buildings, as acceptable in principle subject to the other policies of this plan."

Local Development Framework Policy CI1 of the Local Development Framework supports the need to ensure appropriate school provision is provided across the borough stating that the Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by "supporting extensions to existing schools and the development of new schools and youth facilities"

Regional Policy Guidance - The London Plan (July 2011) London Plan policy 3.18 states:

"Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing facilities or change of use to educational purposes. Those which address the current projected shortage of primary school places will be particularly encouraged."

National Policy Guidance - DCLG Policy Statement on Planning for Schools Development (published 15/08/11)

The DCLG policy statement on planning for schools development is designed to facilitate the delivery and expansion of state-funded schools. It states:

"The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - education the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards."

It goes on to say that:

"It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes."

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities should make full use of their planning powers to support state-funded schools applications."

National Planning Policy Framework (NPPF)

Paragraph 72 of the NPPF reiterates the objectives set out in the DCLG Policy Statement on Planning for Schools Development. It clearly confirms that the Government attaches great importance to ensuring that a sufficient choice of schools places is available.

Douay Martyrs School & Land at Glebe Farm

Development Plan Planning Policy and Planning Obligations

With any complex, multi-use scheme, there are a multitude of planning policy requirements and obligations that need to be addressed at the appropriate stage. The stakeholders in this scheme are seeking to promote debate about the merits of the principles of their proposals. The stakeholders fully acknowledge that community consultation is vital on such a scheme to ensure that a balanced solution is arrived at, one that balances the needs of Hillingdon as a whole.

It is appreciated that the proposals, set a challenge to one of the most cherished elements of the environs, the amenity of Green Belt. To ensure that the perceived loss of a portion of this amenity, the stakeholders are keen to promote sensible, balanced debate about what can be established to address the preconceptions. While one open space area of Ickenham is identified within Hillingdon's Open Space Strategy 2011-2016 as not meeting the minimum quality standard, it confirms that there is no deficiency in District level or Metropolitan Open Space. As such, care will be taken, in developing proposals in consultation, to ensure that more formal local open space is established. It is acknowledged that local authority or GLA policy in terms of the following will need to be established through this process:

- Traffic enhancements – permanent and during construction
- Section 106 agreements
- Community Infrastructure Levy (CIL) contributions
- Affordable / Key worker Housing provision
- Sustainability levels of all permanent construction – buildings, infrastructure and landscaping
- Employment assessment – permanent and during construction
- Permanent creation of leisure amenities – school priority (during school hours) and community priority
- Environmental and Ecological improvements
- Public access to previously restricted amenities

The aim of the stakeholders is not to hide behind the process but utilise the process to help determine the scheme that Hillingdon aspires to and then delivers. The prime driver from the stakeholders has always been the realisation of an outstanding education environment for the 2,000 plus families in the Hillingdon community that this school serves and ensuring it provides wider range of services for the its immediate community.

To this end, the ten Hillingdon Sustainable Community Strategy priorities will be embraced and used to shape the development:

1. Help people to lead healthier, more independent lives
2. Prevent young people from undertaking risky behaviour
3. Increase Housing supply - with appropriate infrastructure
4. Reduce re-offending
5. Increase participation in sport and physical activity
6. Maintain resident satisfaction levels
7. Promote and invest in town centres (not that applicable)
8. Increase access to employment, apprenticeships and skills
9. Maintain parks and green spaces
10. Make it easy for residents to recycle

The stakeholders are cognizant that many parties will need to be consulted about these proposals, due to the thresholds that it breaches one key one will be the GLA. Key issues that will undoubtedly be raised by the GLA will relate to the principle of development, with specific reference to the consideration of alternative sites; urban design, with particular concern raised regarding the layout; inclusive design; and transport and parking. While current GLA rhetoric is undoubtedly supportive of any community school developments, the stakeholders would again wish to ensure that consultation is as inclusive as possible to ensure these items are addressed in a balanced way as the scheme progresses.

Douay Martyrs School & Land at Glebe Farm

Conclusion

Ultimately, this representation validates that Hillingdon deserves education facilities that are sized accordingly, fit-for-purpose, safe and most importantly acknowledged as an outstanding education environment. Hillingdon demands community amenity that is accessible to all with facilities that promote enhanced usage with all the attendant benefits this generates.

The potential benefits for Hillingdon are significant:

- A redeveloped new school facility, on a single site sized for a 10FE intake delivering an outstanding education to Hillingdon citizens – Catholic and non-Catholic;
- A safe site, not skewered by Long Lane. Further measures will be taken to address the traffic issues caused during drop-off and pick-up by the current arrangements;
- An enhanced Green Belt portion with significantly enhanced visual and leisure amenity;
- Affordable and Key Worker Housing delivered at policy levels;
- Capital and revenue contributions to LB Hillingdon through the development;
- Delivered at zero cost to the Public Purse

This representation aims to promote debate around the challenges faced by the Hillingdon community in providing the optimum facilities for its citizens. The full representation to the Local Plan (Part 2) will table evidence in terms of:

- the demographic challenge faced across Hillingdon at Primary and Secondary level;
- the pressure on pupil spaces (Catholic and non-Catholic) in West London;
- the lack of alternative sites suitable for education purposes - acknowledged by LB Hillingdon through its own assessment and Local Plan endeavours;
- the challenge faced by The Douay Martyrs School on a day by day basis let alone providing a viable future for the outstanding education of Hillingdon Catholics and non-Catholics; and
- justification for provision of this facility on Green Belt

Education justification – Demographics; Educational attainment; Safety; basic conditions

Demographics - The need for the redevelopment and expansion of The Douay Martyrs School has been thoroughly investigated. Taking into consideration current pupil statistics it has been demonstrated without an element of doubt that there is a burgeoning need to make provision for school places across the borough, to serve Catholic and Non-Catholics. For example, in September 2021, the cohort that has just started primary school will be attending secondary school and unless there are significant changes in the demographic trends in the Borough, almost 400 Catholic residents of the Borough will be making that transition. Unfortunately, if Douay Martyrs remains unchanged, only 240 of these children will secure places at the school. The remaining 150+ children (5 forms of entry) will accept places in other secondary schools within the borough and potentially displace other residents for whom those schools would have been their preferred option. This situation will be further exasperated by the displacement of those Non-Catholic children who are currently able to secure places at the school. This number currently stands at 114 pupils (4 forms of entry). They too will be seeking placements in the Hillingdon Community Secondary Schools. Therefore, in total, the Local Authority will need to provide a Community Secondary School

with the capacity to admit 270 pupils per year (9 forms of entry) just to cope with the projected displacement caused by one Catholic Secondary School.

Educational Attainment – Ofsted have repeatedly indicated that the ability of Douay Martyrs to deliver an outstanding education is significantly compromised by their current facilities, principally the impact of being a split site. Ofsted quoted ‘The school’s buildings are on two sites separated by a busy main road; this affects punctuality to lessons as well as presenting difficulties for the school and the students.’

Safety – There have been long publicised and debated issues due to the split site nature of the school on either side of Long Lane – there has been one fatality through the current arrangements despite additional crossing controls. This scheme aims to address this by creating one single site linked by bridge across the London Underground railway. Furthermore, this will free the front portion of current main campus to provide a proper school drop-off + pick up facility easing congestion along Long Lane during peak periods.

Basic Conditions – The Douay Martyrs School current accommodation only has an assessed agreed capacity for 216 pupils per year; they currently accept 240 pupils on an interim basis. As policy now dictates an increased staying on rate post-16, this creates greater pressure. Combine this with the DfE policy to not capital fund split site schools and the school is left in very difficult situation - note: this scheme aims to create a one site school that is then eligible for DfE capital funds. This scenario is further exacerbated over the next 5 years as major fabric and services condition items (heating, roofing) become critical and potentially elements that may lead to school closure(s) should they fail to be instigated in due time.

Alternative sites – redevelopment/expansion; relocation in and out of the borough

Redevelopment and expansion on the existing site: This is not a realistic option. The twin sites of the existing school are already over developed. Whilst an expansion of the school on its existing sites is theoretically possible, LB Hillingdon would have to:

- vi. Consent to buildings of significant height (5 to 8 stories) in an area that comprises of mainly residential housing;
- vii. fund the demolition and rebuild of the whole school; and
- viii. arrange for the school to be accommodated in temporary facilities for the 24 – 30 months required to complete the work

Relocation to a site outside of Hillingdon: This is not a realistic option. Whilst it might be possible to find a potential site for the school outside of the Borough, if relocated, it could not continue to serve its current communities and feeder primary schools. In reality, the school would fill with Catholic children but these children would be from the area immediately surrounding the new site. The supply of places for Catholic residents of Hillingdon would be significantly reduced, severely limiting the options of a significant portion of the electorate.

Relocation within LB Hillingdon: Based in Ickenham, Douay Martyrs is reasonably accessible to Catholic residents throughout the Borough. The original siting of Catholic Secondary Schools, by the Diocese of Westminster, was planned to ensure that every school had a strong catchment area whilst offering parents a certain amount of choice. If the school is to be relocated within the Borough, it is necessary to identify and secure a suitable site within 1 mile of the current school. Furthermore, public transportation must be equal to or better than those servicing the existing site. On this principal basis, a detailed analysis has been undertaken in order to identify the most appropriate site for such a school, taking into consideration key criteria including size, location, accessibility, UDP designations and availability. All possible alternatives (all identified Sites in the Local Plan -Part1), and particularly those in more appropriately designated locations, have been carefully scrutinised in making the site choice. The one alternative location of any merit was the Hillingdon Circus site, however LB Hillingdon recently gave consent for this site for retail and residential uses. Hence, all alternatives were not deemed suitable for a range of reasons and were thus rejected.

Green Belt considerations

There are numerous local and national policies that apply to Green Belt land. Our representation to the Local Plan will cover each in detail. In this briefing note we would only seek to highlight a few factors. PPG2 identifies that there are five purposes of including land in Green Belts, these being to i) check the unrestricted sprawl of large built-up areas; ii) prevent neighbouring towns from merging into one another; iii) assist in safeguarding the countryside from encroachment; iv) preserve the setting and special character of historic towns; and v) assist in urban regeneration, by encouraging the recycling or derelict and other urban land. In its 2006 Local Plan, LB Hillingdon acknowledged that purposes ii) to v) were of limited impact on this site.

In relation to factor i) to check the unrestricted sprawl of large built-up areas - we would stress the following: There are two distinct parts of the site. The northern part is bordered to the north and east by a residential neighbourhood. To the west is the Piccadilly/Metropolitan line. To the south is a boundary hedgerow to the southern part of the site. Hence, on three principal boundaries it has an already established urban character. The southern part of the site is bordered to the east by the current Douay Martyrs School playing fields. To the south and west it is bordered by open space that is pre-dominantly being used for agricultural purposes, broken only by the odd farm building and boundary hedgerows. The proposal seeks to protect and enhance the visual and leisure amenity of the portion of the Green Belt that has the 'classic Green Belt characteristics'. Overall the scheme seeks to provide much needed community infrastructure at zero cost to the public purse through sustainable enabling development respectful of the character of the neighbourhood.

This vital community infrastructure is best characterised by National Policy Guidance - DCLG Policy Statement on Planning for Schools Development (published 15/08/11). The DCLG policy statement on planning for schools development is designed to facilitate the delivery and expansion of state-funded schools. It states:

"The Government is firmly committed to ensuring there is sufficient provision to meet growing demand for state-funded school places, increasing choice and opportunity in state-funded education and raising educational standards. State-funded schools - which include Academies and free schools, as well as local authority maintained schools (community, foundation and voluntary aided and controlled schools) - education the vast majority of children in England. The Government wants to enable new schools to open, good schools to expand and all schools to adapt and improve their facilities. This will allow for more provision and greater diversity in the state-funded school sector to meet both demographic needs and the drive for increased choice and higher standards."

It goes on to say that: "It is the Government's view that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations. We expect all parties to work together proactively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes."

The statement clearly emphasises that there should be a presumption in favour of the development of schools and that "Local Planning Authorities should make full use of their planning powers to support state-funded schools applications."

Summary

Taking into consideration the site's Green Belt location a scheme has initially been and will continue to be carefully developed which seeks to not only meet relevant Department for Education requirements and best practice guidance regarding educational delivery, but to also minimise its impact on the openness of the surrounding area and to enhance the visual and leisure amenities of the locality where possible. Naturally any elements of the scheme's design will blend appropriately into its wider setting and will not detract unnecessarily from the visual amenities of the surrounding area. Design elements such as high levels of sustainable building measures will be a necessity not a nicety.

It is considered that the educational need and the lack of more appropriate alternative site options for the provision of the school, combined with the proposed low impact design, high quality landscaping scheme and incorporation of high levels of sustainable build measures, amounts to a case of very special circumstances sufficient to justify the loss of some open space and the provision of the school in this Green Belt location.

We respectfully request LB Hillingdon's support for the principles of the project outlined. This would then allow The Douay Martyrs School, the Diocese of Westminster and Trustees controlling Guys Investment Limited to engage with all stakeholders to develop a community solution meeting the needs and aspirations of all.

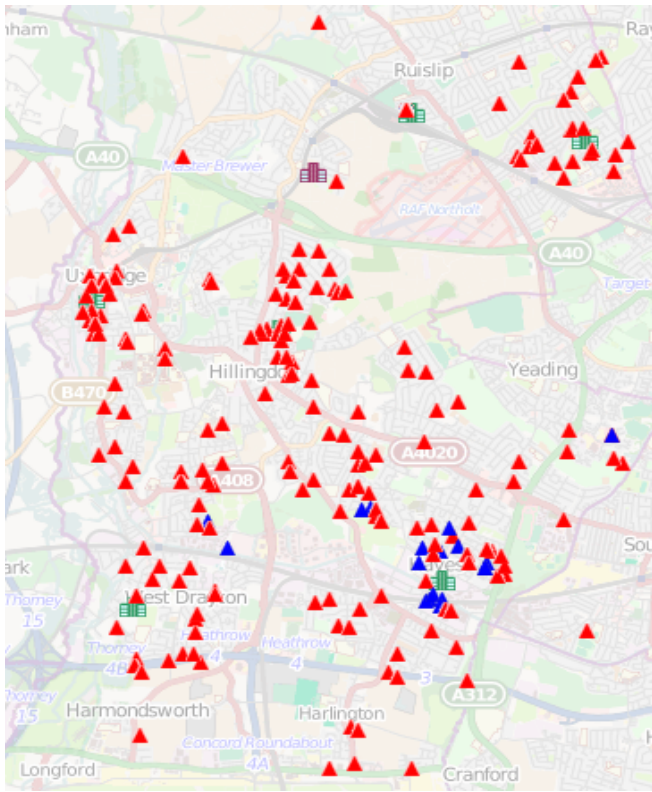
Appendix 2

Primary School Trends

Hillingdon is served by 6 Catholic Primary schools. Together they offer 330 places per year as indicated on the table below. In recent years, the percentage of Catholic Children has been increasing year on year. In 2014, the percentage of Catholic Children starting school in reception exceeded 91% of the total intake..

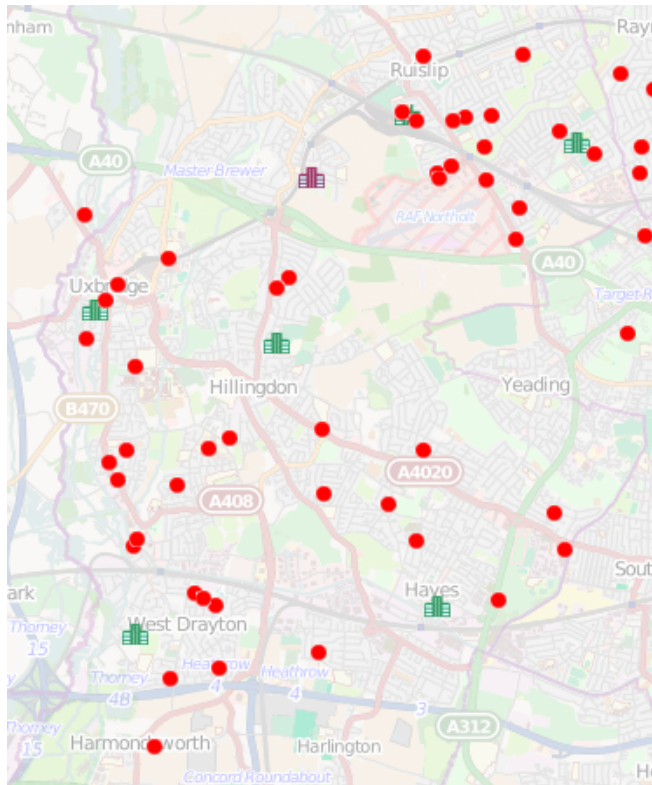
With Catholic admissions being the top priority, this then affects the probability of Non-Catholic children being offered a place. In 2014 more than 450 Non-Catholic children expresses an interest in a place in one of the 6 Hillingdon Catholic Primary Schools. Only 29 applications were successful and the majority of these were for the younger siblings of Non-Catholic children already attending a Catholic School. The success rate for Non-Catholic applicants is less than 7%.

	Region of Hillingdon	Number of Pupils Admitted to Reception Each Year
Botwell House	Hayes	90
St Bernadette	Hillingdon	60
Sacred Heart	Ruislip	90
St Catherine	West Drayton	30
St Mary	Uxbridge	30
St Swithun Wells	South Ruislip	30
Total		330



Map 2: Admissions to Hillingdon Catholic Primary Schools – September 2014

The key to the information contained in this map is the same as for map 1 in main school status section. Once again it is clear that the vast majority of children live in close proximity to their primary schools and within the administrative area of the London Borough of Hillingdon. Before considering the projected longer-term impact on secondary school



Map 3: Unsuccessful Catholic Primary School Applicants – September 2014

This map only refers to Catholic Applicants. In September 2014, 93 children, confirmed as Catholics, failed to secure a place in a Catholic Primary School. As stated above, Hillingdon has not expanded provision in local Catholic Primary Schools. Instead, the council has pursued a policy that focuses on the expansion of Community schools. The net result is that more than 90 Catholic Children are currently taking up places in Community Schools.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Christian
Last name	Jackson
Address	Company Secretary Guys Investments Limited

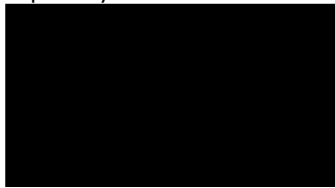
Postcode
Telephone, including area code
Email
Organisation (if relevant)



Agent's name and address (if applicable)

Title	Mr
First name	Christopher
Last name	Spiceley
Address	

Postcode
Telephone, including area code
Email
Company



Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number	Site Allocations and Designations Part 2
Paragraph number	Chapters 5 and 7
Table or figure number	
Map number (Atlas of Changes)	

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

It fails to adequately address the need in the Hillingdon Community for education spaces. While it clarifies the lack of suitable sites for such large establishments it does not adequately identify how secondary school places will be facilitated through the planning process. As the timescale for developing a school is often 4-5 years, positive action needs to be taken now to meet the acknowledged and validated bulge.

Please set out what change(s) you consider necessary Consideration be given to the attached proposal for the

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Douay Martyrs School to expand onto a portion of the Glebe farm site (designated Green Belt). Exploring this opportunity thoroughly and assessing the losses and benefits to the Hillingdon community will ensure LB Hillingdon has fulfilled its duty to co-operate. Furthermore giving the school the chance to make its representations through a full process will match the courtesy and diligence extended to Lake Farm school.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

It will give The Douay Martyrs School and local community the chance to make its representations through a full process, matching the courtesy and diligence extended to Lake Farm school.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Douay Martyrs School & Glebe Farm - Local Plan 2012 (Part 2) Representation.pdf

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

When the Local Plan Part 2 Plan has been submitted for

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

Monitoring



Attachment

On behalf of our client Intu Properties plc (intu) we are pleased to set out below representations on the draft Part 2 of the Hillingdon Local Plan.

Intu, along with their Joint Venture Partners KWAP, are the owners of intu Uxbridge Shopping Centre which opened in 2001 and provides the town's primary shopping and leisure destination with over 500,000 sq.ft of floorspace.

Intu has previously submitted representations to the Core Strategy Preferred Options paper in November 2005, the revised Core Strategy Preferred Options paper in March 2007, the Local Development Framework Core Strategy Draft Consultation in July 2010, and to the preparation of Part 2 of the Local Plan in May 2013.

Our comments related to the Development Management Document, as set out below.

Development Management Document (DMD) - Proposed Submission Version

Policy DMTC 1: Town Centre Developments

Intu supports this policy that encourages a town centre first approach to retail and town centre uses. In order to secure the vitality and viability of town centres, main town centre uses must be directed to town centres. This will protect Hillingdon's shopping hierarchy.

Policy DMTC 2: Primary and Secondary Shopping Areas

Intu supports the protection of the Primary Shopping Areas ground floor for retail uses. However, intu objects to the requirement that:

- A minimum of 70% of the frontage is retained in retail use; and
- A5 hot food takeaways are limited to a maximum of 15% of the frontage; and
- The proposed use will not result in the separation of Class A1 uses of no more than 12m interruption in the frontage of A1 shops or a concentration of non-retail uses which could be considered to cause harm to the vitality and vibrancy of the town centre.

The requirements of this policy do not fit with the more modern shopping patterns and trends and are considered to be too prescriptive. Significant changes to the future of town centres exist and therefore centres will need to evolve in order to overcome the ongoing effects of the recession and increase in internet shopping. The current government's desire is to encourage vibrant and viable town centres through flexible changes of use and this policy does not support this aim. To remain competitive, town centres need to encourage other forms of town centre uses, such as restaurants and cafes in order to encourage visitors to the town centre.

Intu supports policies that seek to provide an appropriate mix between Class A1 and Class A3-A5, but consider it is important to strike the right balance between meeting the needs of the changing role of the town centre. Flexibility is therefore important to embrace the changes. The above requirements are too prescriptive and all would harm rather than help the town centre.

Class A3 uses are a main town centre use (NPPF, Annex 2), which should be directed towards town centre locations in the first instance (NPPF, para. 24, London Plan Policy 4.7 and Local Plan Part 1 Policy E5). Within town centres the demand for food and drink establishments has increased significantly over the past 5 years, including significant expansion in the number of coffee shops, and national branded restaurant chains which have invested heavily and not exclusively in larger centres.

Over the past decade, the proportion of Class A1 retail uses in GOAD town centres has decreased by 15% between 2000 and 2012 (9.1 percentage points), whilst Class A3 and A5 food and drink uses have significantly increased in proportional terms, despite the increase in shop vacancy rate. Growth in Class A3 to A5 uses within town centres is likely to continue in the future, as town centres seek to broaden their attraction and provide a more experimental shopping trip in response to the increase in multi-channel shopping, particularly the rise of internet shopping.

Uxbridge is a metropolitan centre and is a principal centre in the Greater London hierarchy. As a principal centre, Uxbridge must have a strong leisure and restaurant offer to complement the retail uses and to reflect its position in the hierarchy. The need to provide this more diverse offer is further emphasised with the town being identified in the London Plan as a town of Regional/Sub Regional importance for night time economy clusters.

Growth in A3 to A5 uses within town centres is likely to continue in the future, as town centres seek to broaden their attraction in response to the increase in multi-channel shopping, particularly the rise of internet shopping for comparison goods.

The prospects for growth within the catering sector are relatively buoyant. Restaurant uses are increasingly becoming important attractions in their own right, they also increase dwell time and visitor spend and provide a more experiential visit that cannot be found on line. All of this significantly helps to underpin the vitality and viability of town centres. This can be seen with the increase in celebratory chef restaurants and more experimental dining offers.

For a town of its size and status, Uxbridge is currently under-represented in terms of a modern catering offer. As a result, intu advises that by far the strongest demand in Uxbridge town centre is from Class A3 operators, with about three times as many enquiries from this type of operator as from Class A1 retailers. Intu would support a policy that provides the Council with the ability to consider applications on a case by case basis, with a key consideration being the degree to which the proposals will benefit the vitality and viability of the town centre. The introduction of the above inflexible thresholds should therefore be avoided.

The second part of this policy also dictates a set of arbitrary requirements for Secondary Shopping Areas. As outlined above, intu supports the general thrust of the policy to safeguard retail uses, where appropriate. However, the requirements outlined in the policy are again too prescriptive and not reflective of general changes taking place in secondary shopping areas. Intu would support a policy that enables the council to respond positively to development proposals which would support the vitality and viability of a centre and bringing back into active use units that are vacant. To do this the policy needs to enable councils to consider applications on a case by case basis, avoiding inflexible thresholds.

Intu would however support the proposed thresholds of this policy if separate restaurant hub areas are allocated that are excluded from the tight restrictions. As outlined above, there is

strong demand for new restaurant floorspace in Uxbridge and this demand can only be realistically met if the right size, configuration and quality of floorspace and locations are made available. Many types of modern restaurant prefer, where possible, to co-locate in groups of similar type establishments in order to provide choice to potential customers; and to be in close proximity to a major footfall generator such as a shopping centre or leisure anchor. The current policy, without the restaurant hub areas, specifically prevents this from happening.

Intu would welcome an approach similar to that taken by Watford Borough Council in allocating hub areas. For Uxbridge this would mean the Piazza area and the adjacent High Street area would be allocated as a Class A3 restaurant hub, exempt from the policy's thresholds. Intu suggests the following wording to be included in this policy:

A3 Hub Areas: The restrictions set out within DMTC2 relating to the proportion of non-A1 uses and uninterrupted A1 frontage will not apply in the areas defined as restaurant hubs. A3 uses will be encouraged to locate in these areas.

Policy DMTC 4: Location and concentration of town centre uses

Intu generally supports the thrust of this policy, however the policy should be amended to state that where proposals come forward in areas where residential properties are nearby they will be expected to demonstrate that there will not be unacceptable disturbance or loss of amenity.

Intu has identified a strong market for food and beverage uses in Uxbridge town centre, especially around the High Street and Piazza areas. These uses will keep the town centre viable in the coming years, promoting a vibrant centre and evening economy. Indeed, A3 uses, especially when clustered together around a strong leisure anchor, increase footfall and activity and this will enhance the performance of the shopping centre by attracting shoppers and by offering an enhanced range of food and drink facilities which will increase the dwell time of shoppers.

Cluster and zoning of the food offer is essential. Operators expect to be located close to similar dining offers to provide critical mass and choice for customers. They also expect to be located within areas that have high footfall throughout the day to ensure they are highly visible and accessible to shoppers. Locating casual dining uses in secondary areas in a dispersed manner is not desirable. For this reason, the policy should encourage such uses and allow for flexibility in decision making.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Brett
Last name	Harbutt
Address	[REDACTED]
Postcode	[REDACTED]
Telephone, including area code	[REDACTED]
Email	[REDACTED]
Organisation (if relevant)	Intu Properties plc

Agent's name and address (if applicable)

Title	Mr
First name	Matthew
Last name	Williams
Address	Nathaniel Lichfield & Partners, [REDACTED]
Postcode	[REDACTED]
Telephone, including area code	[REDACTED]
Email	[REDACTED]
Company	Nathaniel Lichfield & Partners

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
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To which part of the Local Plan Part 2 does this representation relate:

Policy number	Policy DMTC 1
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	

- Do you consider that the Local Plan Part 2 is
- Sound
 - Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 - It has not been positively prepared
 - It is not effective
 - It is not justified
 - It is not consistent with National policy
- If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.) See Attachment

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible) See Attachment

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary. N/A

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB) Intu Reps for Hillingdon Local Plan Part 2 - 04-11-14.pdf

I am commenting on Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number Policy DMTC 2

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.) See Attachment

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible) See Attachment

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary. N/A

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number Policy DMTC 4

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, It has not been positively prepared

indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary. N/A

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

When the Local Plan Part 2 Plan has been submitted for independent examination.

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

The adoption of the Local Plan Part 2.

Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Mr
 First name David
 Last name Brough
 Address

Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)

Agent's name and address (if applicable)

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number As itemised in the response
 Paragraph number As itemised in the response
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
 Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 It has not been positively prepared
 It is not effective
 It is not justified
 It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Overview

The Hayes Town Partnership was set up by the Council some years ago to assist in the regeneration of Hayes and consists of representatives of the Council, the Police, Hayes Town Business Forum, Hillingdon Chamber of Commerce, Uxbridge College, Brunel University and major developers. The comments given in this response are a collective summary of the views of the Partnership and each specific point is not necessarily shared by every member, some of whom will be making their own responses.

As a key local partner the Partnership welcomes the

opportunity to comment on and influence Part 2 of the Local Plan. The Partnership broadly welcomes the proposals to achieve regeneration and growth in Hayes and recognises the need for this structural approach in delivering change. In particular it accepts and supports specific proposed Development Management Policies in the following areas:

- Release of surplus industrial and warehousing land as part of a managed process (para 2.3)
- Protection and enhancement of town centres as crucial to social, economic and environmental wellbeing and in promoting a sense of identity (para 3.1)
- Resistance, other than in exceptional circumstances, to the development of out of centre locations for town centre uses (Policy DMTC1B)
- Support in appropriate town centre locations of night-time activity (para 3.20)
- Restrictions within the limits of present planning laws to prevent the proliferation of minicab offices, betting shops and takeaways (Policy DMTC4)
- Promotion of safety and planning for safer places (DMHB15)
- Provision of appropriate community facilities and inclusive access to such facilities as an essential prerequisite for the proper functioning of the community (para 7.1)
- Retention of existing community, sport and education facilities (Policy DMCI1) although it would like to see specific mention of facilities for young people.
- Recognition of the importance of providing sites for religious worship and assembly (para 7.15) although it considers that there needs to be a clearer set of policies to ensure that this is achieved.

It is recognised that representations on the draft Plan have to be framed in accordance with the relevant Regulations which require it to be sound and prepared in line with legal and procedural requirements. Rather than get into a debate about whether it is compliant or unsound the Partnership will focus its attention on making practical suggestions and comments on the contents of the Plan.

There is though one fundamental point that the Partnership wishes to make. Whilst it accepts the need to reduce the amount of employment land in Hayes and its replacement by mixed use developments it believes that the Plan fails to give sufficient attention or structure to the essential local services that are required to support the anticipated residential growth.

The Partnership recognises that it is not the role of the local plan consultation to address in detail the need for community facilities. The Partnership further acknowledges that there are proposals to improve the infrastructure particularly in relation to traffic management and plans to deal with the increasing demand for school places. There is however significantly less clarity in terms of provision for health and community facilities.

The Partnership feels that not dealing with local service provision at the same time as putting together proposals that will see the creation of an additional 2,000 residential units in Hayes Town is a significant oversight. Furthermore it is an oversight that could leave the residents of Hayes with a long term legacy of under provision in respect of community facilities.

Background

Until recently Hayes has been in decline as a town centre. It shares many of the features of other town centres up and down the country and has suffered in particular because of the closure of significant companies in its

industrial hinterland combined with the building of drive-in shopping facilities at other locations. However the coming of Crossrail offers Hayes a new beginning and a chance to re-invent itself as a vibrant 21st century town centre.

Interest in the future of the Town has already been shown by developers in the building of High Point Village and the extensive plans for the re-vitalisation of the former EMI site, now known as the Old Vinyl Factory. This level of interest is growing as the opening date for Crossrail comes nearer and it will be reinforced still further with the imminent availability of the Nestles site following the closure of the factory at the end of 2014.

The economic benefits expected from the high speed rail connection with central London mean that land prices will be rising and the potential for redevelopment can only increase. With such a promising background the Partnership feels that at the same time the Council is considering the adoption of the Local Plan part 2 it should also consider and respond to the consequences of the plan.

Need for coordinated approach

The draft proposals identify individual sites in different parts of the Town Centre and suggest that they may be suitable for development as shown in the following table:

Site Proposed development Units

Enterprise House Blyth Road Residential 75-80

Old Vinyl Factory Blyth Road Residential-led mixed use 642
Blyth Road and Station Road to canal Residential-led mixed use 248

Nestles site and adjoining land Mixed use 707

'Western Core' – Station Road Retail with residential above 60

Chailey Industrial Estate Pump Lane Mixed use 150

Silverdale Road/Western View Mixed use residential 300

If all these sites are developed as proposed there would be the following consequences:

- Hayes Town would have an additional 2182 to 2187 housing units, more than one third of the total planned for the whole Borough
- There would be enormous pressure for additional school places, health services, play space, youth provision and ancillary services such as dentists.
- There would be a substantial increase in traffic and pressure on parking
- The current Hayes Young People's Centre and the YMCA Hostel (Ventura House) would both be lost
- The Hesa Primary Care Centre would need to be replaced

It is the strongly held view of the Hayes Town Partnership that it would not be desirable or realistic to provide an additional 2000 housing units in the Town Centre without having an outline planning framework or area plan to show how essential support facilities are to be in place for the increased numbers of people who would be living in what is an already crowded area. Without such a framework the Local Plan would be in danger of not maximising the potential that Crossrail and the Nestles and the Old Vinyl Factory sites offer to Hayes.

Potential development of Grand Union Canal frontage

The Plan proposes some development alongside the Grand Union Canal but in the opinion of the Partnership it misses a once in a lifetime opportunity to make use of the enormous potential presented by the fact that the Canal passes through the heart of the Town Centre. It is one of the hidden assets of Hayes but its benefits have yet to be

realised.

Like town centres in other parts of the country Hayes turned its back on the canal many decades ago but over the last twenty years or so many of these towns have recognised that the water frontage offers a unique opportunity to transform their centres into attractive places to live, work and shop. Examples include Birmingham, Banbury and Reading.

The building of the High Point Village housing development has been a step in the right direction and the proposal to release of the Nestles site mentions the possible use of the canal frontage (but only as the place to locate high rise housing). The development of the Silverdale Road/Western View site would also offer the prospect of an attractive development on the north side of the canal although a notable omission is the lack of any reference to Shackles Dock and its potential. Of greater significance is the whole southern side of the canal from Station Road to Printing House Lane which could be transformed into an active water frontage that would give Hayes a central core in place of the strung-out ribbon-development of Station Road and Coldharbour Lane.

Comments on specific sites

In addition to the above general observations the Partnership has the following detailed comments on specific sites:

'Western Core' (Station Road)

The boundaries of this site should be re-examined to ensure that it includes the large area of waste land behind McDonald's stretching through to Botwell Lane. Much of this land is not in productive use and currently attracts a range of anti-social behaviour including rough-sleeping, rubbish-dumping and worse.

The northern boundary of the site might also be reviewed since the present building occupied by the Methodist Church is in poor condition and could probably benefit from redevelopment.

Chailey Industrial Estate

The Plan proposes to release the Chailey Industrial Estate for mixed use development including the provision of 150 residential units. The Hayes Muslim Centre is currently located quite close nearby in the former Civic Hall in Pump Lane but this is inadequate for the numbers of people who use it, especially for Friday prayers. The limited space available also means that the Centre is unable to provide the community facilities and services that are needed for its members. The management of the Centre is committed to finding a new site on which to construct a purpose-built mosque.

The Local Plan recognises that Hillingdon includes a wide range of cultural, ethnic and religious communities and accepts that these groups often have difficulty in finding suitable locations for new buildings. It commits the Council to assist wherever possible but fails to make any specific proposals. The most pressing need in Hayes is for purpose-built facilities for the Muslim community and it is suggested by the Partnership that the release of the Estate from industrial use should be investigated to see if the site might be suitable for the building of a mosque. If such a proposal came to fruition it would be up to the Hayes Muslim Centre and any other interested groups to make a bid for its acquisition and development.

Silverdale Road/Western View

As mentioned in the earlier comments about the Grand Union Canal the Silverdale Road/Western View site has considerable development potential because of its water frontage. The location of the historic Shackles Dock in the middle of the site is a positive asset and presents the possibility that the Dock might be extended to its earlier length with the benefit of an attractive water-side development. There is an existing warehouse building to the north of the dock and although it is not listed its retention and conversion could contribute towards an active use of the water frontage. For these reasons it is considered that the requirement for the continued existence of the Dock should be stated specifically in any planning proposal.

In addition there is currently a public house at the Western View/Station Road junction and the proposed mixed use development should include provision for the continuation of a similar facility.

Benlow Works Silverdale Road

The Benlow Works in Silverdale Road is a Grade 2 listed building constructed in the early part of the twentieth century with a reinforced concrete frame and a brick exterior. It was the home of the Orchestrelle Company (a forerunner of EMI) but over the years it has fallen into a dilapidated state and is now on the Heritage at Risk Register maintained by English Heritage. This describes it as being in very poor condition with no solution agreed as to its future. While the building is currently in the strategic employment area it is suggested that this is a very similar situation to that faced by Enterprise House and that the Local Plan provides a good opportunity to review its future use.

Nestles site Nestles Avenue

With the impending closure of the Nestles factory this will be the single largest development site in Hayes Town and it offers huge potential. One of the biggest challenges that the site presents is its lack of connectivity with the town centre. To maximise the potential of this site in terms of providing employment and residential facilities, consideration needs to be given to how it can be linked to the town centre and also the railway station. Connectivity to the site could be improved by a pedestrian bridge across the canal and by opening up the canal towpath to link the Nestles site with the High Point Village development.

The canal frontage presents an opportunity to provide active uses such as cafes, restaurants and community facilities. The Hayes Canal and Craft Fair earlier this year highlighted substantial local interest in kayaking and this site would provide an ideal location for the development of a waters sports centre.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Arising from the comments made in response to Question 6 the following changes are needed in order to improve the soundness of the Plan:

- Draw up a specific planning framework for Hayes Town Centre in order to ensure that essential support facilities and services are in place in order to meet the needs of the increased numbers of people who would be living in the Town Centre if the proposed developments go ahead.
- Review how the frontage of the Grand Union Canal could be used in a creative and co-ordinated way as a spur to regeneration and in particular examine the possibility of developing the frontage on the southern side of the canal between Station Road and Printing House Lane.
- Amend the boundaries of the 'Western Core' site for the reasons given.

- Investigate whether part of the Chailey Industrial Estate could be developed as a site for a purpose-built mosque.
- Ensure the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View site.
- Consider whether the Benlow Works should be released from industrial use in order to ensure the restoration and proper maintenance of this Grade 2 list building.
- Explore the provision of a footbridge between the Nestles site and the Hayes Town side of the Grand Union canal.

Yes

To explain the basis of the overall submission and to comment in detail on specific sites

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

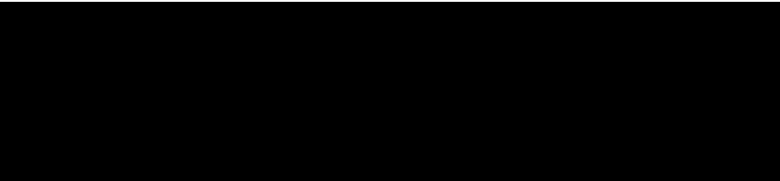
Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

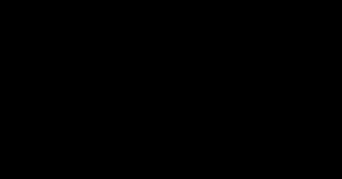
The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

A large black rectangular redaction box covering the monitoring information section.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	David
Last name	Brough
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Hillingdon Canals Partnership

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
To which part of the Local Plan Part 2 does this representation relate:	
Policy number	As itemised in the response
Paragraph number	As itemised in the response
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input checked="" type="checkbox"/> Sound
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
	<input checked="" type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Summary

The Hillingdon Canals Partnership commends the work done in recent years by the Council to improve the towpath and the Grand Union Canal and believes that the Local Plan recognises the potential importance of the Canal to the Borough. However it believes that the specific proposals made in the Plan fail to give sufficient attention to its role as a focal point for recreation and physical activity, its contribution to the environment or the potential impetus it could give to the regeneration of town centres such as Hayes and West Drayton.

The Partnership is made up of representatives of the Canal and River Trust, London Waterway Partnership, Hillingdon Council, Hayes Town Partnership, Yiewsley and West Drayton Town Centre Action Group, Groundwork South, Inland Waterways Association (Middlesex Branch), Thames 21, Friends of Slough Canal, GlaxoSmithKline, Uxbridge Gazette plus the Member of Parliament for Hayes and Harlington. The general thrust of this response is supported by the Partnership as a whole although there may be slight differences of view on the specifics of each detailed comment. A number of member organisations are also making their own individual submissions.

Background

Hillingdon has more miles of canal than any other London Borough with the main line of the Grand Union running virtually the whole length of the Borough from Harefield in the north down to Uxbridge, Cowley, Yiewsley, West Drayton, Stockley Park and Hayes before leaving the Borough and heading for Brentford and The Thames. Then there is the Paddington Branch which runs from Bulls Bridge near to the Hayes By-pass and north through Yeading and into Greenford before joining the Regents Canal in central London. The Slough Arm leaves the canal at the Cowley Peachey junction in Hillingdon but is for the most part outside the Borough.

The stretch of the canal from Harefield to Cowley has a wonderful environment and needs little but careful protection. However visitors to Hayes or West Drayton Town Centres would hardly know there is a canal and boaters passing through would hardly know there are town centres to visit.

The canal offers the following possibilities:

- Development of vibrant water fronts in both Hayes and West Drayton which can become open and attractive focal points in these town centres.
- Potential to replace old and worn out buildings with modern well designed schemes that could include housing, offices and public services.
- Exploitation of local heritage and retention and sensitive development of old features such as Shackles Dock in Hayes Town.
- Temporary moorings for visitors and permanent fully serviced moorings for people to live in the heart of our town centres.
- Use of the canal for freight transport, trip boats, water taxis and canoes.
- Improved access for pedestrians and cyclists together with purpose-built walking and cycling routes which are traffic free, quiet and safe
- Places to fish, to enjoy nature and to relax.
- Recycling of canal water for sustainable cooling for factories and offices.

Any strategy for the canal has to give careful regard to the balance between development and preservation of the natural environment. Without proper planning some stretches of canal could become endless lines of houses or flats with an attractive water outlook for residents but a loss of amenity for others.

In recent years there has been growing recognition by the Council of the value of the canal as an environmental asset and the role of the towpath as a walking and cycling route. Funding has been secured for improvement of towpath surfaces in some areas and there have been successful projects to open up the canal at Western View in Hayes. Perhaps the most notable improvement has been the construction of an eye-catching new bridge over the canal

in West Drayton

Despite these promising steps forward there is much that remains to be done and the Local Plan offers an opportunity for the contribution of the canal to be given higher priority than at present. Strategic Objective 3 in Part 1 of the Plan commits the Council to 'Improve the quality of, and accessibility to, the heritage value of the Borough's open spaces, including rivers and canals as areas for sports, recreation, visual interest, biodiversity, education, health and wellbeing'. This is fine as far as it goes but there is no recognition of the contribution of the canal to quality of the landscape in town centres or its potential role in regeneration.

Part 2 of the Plan acknowledges the interest of developers in waterside developments and the proposed Development Management Policy 18 requires developers to ensure that their schemes make a positive contribution to the canal. It is submitted that this is an inadequate response to the opportunities offered by the canal, not only in town centres but across the Borough as a whole.

Town centre regeneration

Hayes Town Centre is an example where a proactive policy for the development of sites fronting the canal could make a truly transformative change to the vibrancy and appearance of the Town. The canal is one of the hidden assets of Hayes but its benefits have yet to be realised. Like town centres in other parts of the country it turned its back on the canal many decades ago but over the last twenty years or so many of these towns have recognised that the water frontage offers a unique opportunity to make their centres into attractive places to live, work and shop. Examples include Birmingham, Banbury and Reading.

The building of the High Point Village housing development has been a step in the right direction and the proposed release of the Nestles site mentions the possible use of the canal frontage. The proposed development of the Silverdale Road/Western View site also offers the prospect of an attractive development on the north side of the canal although a notable omission is the lack of reference to Shackles Dock and its potential. Of greater significance is the whole southern side of the canal from Station Road to Printing House Lane which could be transformed into an active water frontage that would give Hayes a central core in place of the strung-out ribbon-development of Station Road and Coldharbour Lane.

The Local Plan is perhaps a one-off chance to realise the potential of the canal in regenerating Hayes Town Centre but the current draft fails to seize it.

Environmental contribution

The Plan recognises that canal makes an important contribution to the environment of the Borough and its crucial role in the protection and enhancement of Green Chains. However Policy DME15 does little to ensure the protection of the character of the canal from insensitive developments. The Council has already designated a number of specific locations along the canal as Conservation Areas and there are good grounds for considering whether the whole length of the canal in Hillingdon should be so designated. It is understood that Ealing and Hounslow Councils have taken such a course of action.

Provision of moorings

The primary purpose of the canal was for the passage of

boats and this remains of paramount importance even though this is now mainly for leisure rather than the carriage of freight. The movement of boats provides life and interest but for this to happen there has to be an adequate provision of facilities for mooring and servicing. At present there is limited provision, especially in Hayes and West Drayton but with the coming of Crossrail there is likely to be an increased interest in residential moorings at these locations. Policy DMHB25 seeks to control standards for moorings but there are no policies in place to promote extra provision as part of a managed process.

Comments on specific sites

In addition to the above general observations the Partnership has the following detailed comments on specific sites:

Nestles site and adjoining land

A mixed use development of the Nestles site is accepted in principle but more thought needs to be given to how the canal frontage is to be used to best effect.

The tower blocks of the nearby High Point Village sit directly on the water's edge with a limited landscaped area and there is currently little opportunity for canal-related activities other than the visitor moorings which are currently unusable. It is considered that it would be undesirable to promote development that ends up with the canal being surrounded by high rise flats but with no water-based activities.

Attempts are being made to find a suitable base for a local kayak club in or near to Hayes Town Centre and consideration should be given to the possibility of the Nestles site including a centre for water-based recreation. This could include an educational facility that builds on the excellent work done by Groundwork in providing a floating classroom in the form of the electrically-powered wide boat known as Elsdale. This introduces school-children to the history and ecology of the canal and builds respect for its contribution to the local area. The development could include a permanent mooring and charging facility for the boat which is currently at a temporary location.

The stretch of towpath opposite the site is currently little used despite efforts to increase walking and cycling and its relatively remote location deters people from taking advantage of it as a place for informal recreation. The Nestles site also lacks direct access to the Town Centre and it is therefore suggested that any development plans should include a requirement to construct a footbridge across the canal that would provide a pedestrian link to the shops and other amenities as well as increasing the flow of people along the towpath.

'Western Core' (Station Road) Hayes

For the reasons set out above it is suggested that the 'Western Core' site should not just be the part along Station Road but that consideration should be given to it being widened to include the whole of the southern canal frontage along the northern side of Clayton Road and up to Printing House Lane. It is appreciated that this is currently designated as strategic employment land and that if it is to be considered for mixed use development that would be in place of a site or sites of an equivalent area already identified in the Plan.

Silverdale Road/Western View

The Silverdale Road/Western View site has considerable

development potential because of its water frontage. The location of the historic Shackles Dock in the middle of the site is a positive asset and presents the possibility that the Dock might be extended to its earlier length with the benefit of an attractive water-side development. The adjoining warehouse building at the north end of the site is not listed but its retention would improve the prospects of achieving water-based activities that make use of the Dock as more than as a visual amenity for the flats that may be built there. It is considered that the requirement for the continued existence of the Dock should be stated specifically in any planning proposal.

In addition there is currently a public house at the Western View/Station Road junction and the proposed mixed use development should include provision for the continuation of a similar facility.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Arising from the comments made in response to Question 6 the following changes are needed in order to improve the soundness of the Plan:

- Ensure that as part of the Local Plan the Council develops a strategy for optimising the environmental, recreational, transport and regeneration benefits of the Grand Union Canal along its whole length through the Borough.
- Review how the frontage of the canal could be used as a spur to town centre regeneration in Hayes and West Drayton.
- Consider designating the whole length of the canal in Hillingdon as a Conservation Area.
- Develop policies to promote the provision of moorings and associated facilities.
- Investigate how the canal frontage of the Nestles site could be used in a creative way, including the possibility of a water-based education and recreation centre with a mooring for the floating classroom plus a footbridge linking the site to the towpath and Hayes Town Centre.
- Examine the possibility of developing the frontage on the southern side of the canal between Station Road Hayes and Printing House Lane.

Ensure the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To expand on the overall theme about the importance of the canal and to comment on specific sites

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

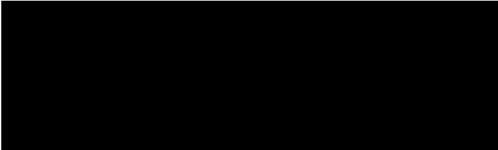
The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mrs
First name	Janet
Last name	Sweeting
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Garden City Estate Residents Association

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Development Management Policies
To which part of the Local Plan Part 2 does this representation relate:	
Policy number	DME2 Employment Sites outside designanated Employment Areas
Paragraph number	2/11
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is

<input type="checkbox"/>	Sound
<input type="checkbox"/>	Prepared in accordance with the duty to cooperate, legal and procedural requirements?
<input type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified
<input type="checkbox"/>	It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

There needs to be a small addition to the wording in order to ensure that some sites will be deemed to be unsuitable due to poor unsuitable access

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The third bullet point to read,
'site is unsuitable for industrial reuse or development because of size, location or lack of suitable access

If your representation is seeking a change, do you

No

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

New Policy suggested DMH9

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Current document does not take into account the need to deliver 'Lifetime Homes' ie homes which will meet the needs of residents throughout their lifetime including policies to secure lifetime mobility for residents.

Please set out what change(s) you consider necessary New Policy to read

to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

' New housing needs to be built to lifetime homes standards and have at least 1 carpark space allotted to it to ensure that the accommodation can be used by those who need assisted living'

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

New Policy

Paragraph number

Page 38 Sustainable Living

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

There is a need to deliver sound strategic policy which requires maximization of natural light and reduced energy consumption.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

'Obscured glazing to any room other than bathrooms should be resisted in order to maximize natural light.'

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

New Policy

Paragraph number

Page 38 Sustainable Living

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

A Policy is required which will ensure that new housing is only delivered in areas where air quality is above legally safe limits.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New Policy to read

'New housing should only be delivered in areas where air quality is above legal limits.'

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

New Policy Ensuring balanced provision of essential infrastructure provision

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Local Plan Part 2 does not take into account the experience of local people where new housing has been delivered over the past decade and where necessary infrastructure to support the new residents has not been put in place. The GCERA Residents' Association has had to deal with many, many concerned local residents who cannot get a doctors appointment within 4 weeks and who have been unable to find a place in local primary schools for their child, where there are few facilities for play/recreation within a reasonable distance of new homes. Despite policies in Strategic Local Plan Part 1 there are major problems in this area of the borough

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New policy to read 'Increase in housing provision should be accompanied by appropriate increase in health, education, community recreational and leisure facilities before occupancy of new housing in order to ensure that there is no unacceptable and undue pressure on existing residents.' There is already a deficiency in respect to services and the gap needs to be filled before additional development proceeds.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB12 Additional new criteria

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound,

indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Not sufficient information on appropriate height of new build. It is important that new build does not overwhelm existing buildings which would lead to new build damaging the character of an area.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Additional Items to read

1. Be subsidiary in height to landmark buildings, buildings of importance or those which determine the character of an area.

2. Be subsidiary in height to heritage assets and respect their settings

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2

Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMH15

Paragraph number

pAGE 55

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Some developments have recently been built either without adequate recreation /childrens play areas (Porters Way developments refer) or having such spaces in inappropriate areas which cannot be easily supervised. This has led to an increase in crime and antisocial behaviour in some developments.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

New addition to read

Ensure in all new developments that amenity space and childrens recreation areas are positioned so that they can be easily supervised from all neighbouring properties

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DME10

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Flood risk must be alleviated.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Wherever possible as much green space around new development should be provided.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Policy DME118 PAGE 93 Air Quality

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to

Air quality is an issue of concern to the residents of West Drayton. Traffic pollution is increasing and there are some

comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

areas between the wards of Yiewsley and West Drayton where pollution levels are only marginally under safe levels. It is important therefore for development not to increase pollution levels and that new development which uses HGVs is not built in areas where air quality is already poor.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Additional information to include

'New housing will be resisted on sites and in areas where air quality is above legally safe limits for human health

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

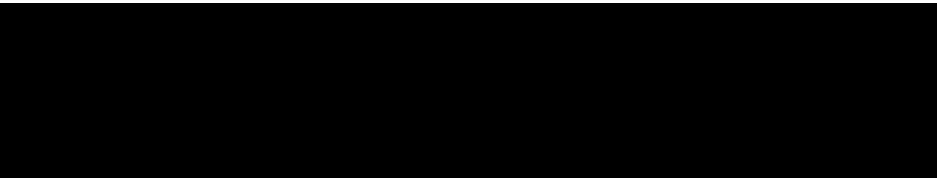
Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

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A large black rectangular redaction box covering the monitoring information section.

A large empty black rectangular redaction box covering the bottom half of the page.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mrs
First name	Janet
Last name	Sweeting
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Garden City Estate Residents Association

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2
	Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number	DMC11 Page 104
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> It has not been positively prepared
	<input checked="" type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The south of the borough has seen spaces for sport being used to deliver new housing. The situation is now that facilities for community, sport and education are insufficient to meet the needs of existing residents. No more existing facilities should be lost and the Local Plan Part 2 should reflect this. The Plan should strengthen policies in order to protect existing facilities.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policies should be strengthened to indicate that all existing Community, Sport and Education facilities will be protected from development.

If your representation is seeking a change, do you	No
--	----

consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMC18 Page 114

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Housing is the main issue in many areas of the borough. There is evidence that developers are reducing social housing/affordable housing capacity on sites due to contribution developers need to make Re CIL

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Policies need to be robust so that CIL will not be affecting social/affordable housing allocations on new development

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMT6 Page 128

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Need to encourage all development to provide reserved car park spaces for vulnerable categories of residents

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add the phrase 'people over the age of 65' to list of vulnerable people requiring spaces re parking provision

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Nothing selected

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMT7 Page 129

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The Yiewsley and West Drayton areas are experiencing very high levels of HGV movements due to illegal use of some very large industrial sites. It is vitally important that sites which may need high HGV generating uses should be located in areas which are away from residential areas in order to preserve and protect human health.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Add new paragraph to policy DMT 7 Page 129. 'Proposals giving rise to a high generation of HGVs must be carefully located due to their disproportionately high impact on air quality.'

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

1. Old Coal Yard site Tavistock Road. The GCERA supported by nearly 2000 residents in West Drayton and an equally large number of residents in Yiewsley Ward supports wholeheartedly the removal of the above site from its IBA designation. All evidence presented to the Council by residents and others at the 10th December 2013 planning application meeting and at the Examination in Public of the WLWP indicates that the site is totally unsuited for this designation and for the high generation of HGVS. Its location close to a Crossrail Station and bus station means that the site is more suited to mixed use development which would omit HGVs.

2. It is vital that for all sites designated for housing, provision must be made for health and education and community facilities BEFORE any new homes are occupied. At present existing residents of Yiewsley and West Drayton are significantly disadvantaged by the non provision of vital services required by the areas increased population, due to new house development. Acute pressure is being experienced on all local services such that health provision, primary places, community, recreation and library facilities. No new development in the area should be allowed to proceed without all services being in place UP FRONT.

School sites

Sites should be identified for new secondary schools within the Plan. There will be particular pressure when the increase in primary pupil numbers hits the secondary sector from 2016 onwards. The first new places are required in the north and central parts of the borough, but increases in primary capacity in a large number of primary schools in the south of the borough means that at least one new secondary school will be needed in the south of the borough and therefore a site for this provision is needed.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

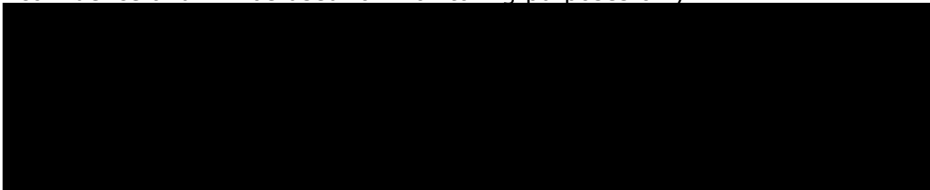
Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring

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A large black rectangular redaction box covering the monitoring information section.

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	Raymond
Last name	Gill
Address	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	The Inland Waterways Association-Middlesex Branch

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
To which part of the Local Plan Part 2 does this representation relate:	
Policy number	SA 10 Land to the South of the Railway, including Nestle
Paragraph number	
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input type="checkbox"/> Sound
	<input type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input checked="" type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The policy for Site A is unsound as it proposes a density, which would result in inappropriately high buildings that would be to the detrimental to the character of the Grand Union Canal.

The main block of the Nestle site is locally listed and the entire site (Site A) is a designated Conservation Area. The local listing recognizes the contribution that the factory makes as 'a key landmark along the canal'.

It is therefore not appropriate for Policy SA10 to propose provision of up to 500 dwelling units. The conservation issues at this site imply that part of the Wallis Gilbert and

Partners building should be retained as well as the avenue and landscaped space to the south. This could lead to unacceptably high development next to the canal in order to meet the housing density target proposed in Policy SA 10.

The policy criteria states that 'higher development should be located along the canal frontage. Evidence from other canal side developments suggests that this approach leads developers to construct the maximum number of private for sale or shared ownership units along the canal frontage in order to maximize development revenue and to offset the costs associated with the provision of affordable housing. The construction of high buildings next to the canal will result in a scale inappropriate to the context of the canal and create a physical and visual barrier between the rest of the scheme and the valuable amenity of the waterside location.

In addition the number of dwelling units proposed on Site B is contradictory between the SA 10 Policy (171 units) and the Site Information schedule (207 units).

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The Policy criteria should be reworded to propose a mixed-use development in which the number of dwelling units will be determined by the designation of the site as a Conservation Area (Botwell-Nestles, Hayes Map 22.4).

Reference to higher density development being located along the canal frontage should be removed from the Policy criteria.

The Policy criteria should include a statement requiring that the new development should allow a significant part of the Nestle building to remain an important landmark along the canal.

The Site Information schedule should be corrected to reflect the Policy criteria.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

No

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

SA 19 Silverdale Road/Western View

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan The Policy criteria are unsound in that they make no

Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

reference to the preservation of Shackles Dock in any future development. Many docks on the section of canal between Cowley and the Paddington Arm have long been filled in leaving little or no trace of the waterborne commerce they once supported. Shackles Dock is of historic importance and could be a valuable community facility for paddle sports at the heart of a new development. There is also an opportunity to extend the dock to its original length.

An existing warehouse building to the north of the dock probably dates from a similar period as the dock. Although this building is not listed its retention and conversion to a new use close to the dock could provide an attractive part of a new development.

Although the Policy criteria mentions the provision of active ground floor uses the wording does not specifically require these to be located along the canal frontage where they could contribute to the prevention of anti social behavior which is currently prevalent on the towpath adjacent to the Station Road bridge.

A criterion for determining housing density is based solely on the PTAL rating for the site. A more important consideration will be the townscape issue of the impact of high buildings along the canal frontage that could create a disastrous and unpleasant canyon between the new development and the recently completed High Point Village (nine storeys) on the other side of the canal.

The existing public house (The Old Crown) at the western end of the site could, in conjunction with improved visitor moorings, encourage boaters to stop in Hayes and use the town centre's other facilities. The Policy criteria should directly refer to the continuation of a Class A3 use within the new development either at the existing public house site or elsewhere in a location visually connected to the canal towpath.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The Policy criteria need to be amended to include the following:

Shackles Dock should be retained and restored for paddle sport or other appropriate waterspace uses. The design proposals for the site must include an independent feasibility study to examine the extension of Shackles Dock to its original historic length. The scope and terms of the feasibility study are to be agreed with the Council.

The existing warehouse to the north of Shackles Dock should be restored and converted to a new use appropriate to its location next to the dock.

Active ground floor uses should be provided along the canal frontage.

Development along the canal frontage directly facing the Vantage, Cardinal and Navigation buildings of High Point Village should be limited to a maximum of four storeys. Development of the remainder of the canal frontage to the east should be no more than five storeys in height. Higher density development should be located at the centre of the main part of the site.

Class A3 uses should be provided either at the existing public house site or at other locations visually connected to the canal towpath.

No

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number SA 3 Eastern End of Blyth Road, Hayes
Paragraph number
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
 Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 It has not been positively prepared
 It is not effective
 It is not justified
 It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA 3 has not been positively prepared as it fails to take account of the potential of sites adjacent to the Grand Union Canal, which should be included to create a larger and more significant redevelopment area at the southern gateway into Hayes town centre. These sites should include the entire area between the canal and Clayton Road up to the boundary with Trevor Road.

Opportunities exist along this extended site area to provide much needed residential moorings on the non-towpath side of the canal.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Site B to be extended to include the entire area between the canal and Clayton Road up to the boundary with Trevor Road.

Site B Policy criteria to be revised to take account of a larger site area and require the provision of residential moorings in accordance with Policy DMHB25.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number SA 27 Hayes Bridge, Uxbridge Road, Hayes
Paragraph number
Table or figure number
Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
 Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 It has not been positively prepared

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

- It is not effective
- It is not justified
- It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA 27 has not been positively prepared as the 'canal side improvements' make no reference to the opportunity at this site, which is on the non-towpath side of the canal, to create much needed residential moorings.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The Policy criteria should be rewritten to include: Development proposals should incorporate canal side improvements including the provision of residential moorings to be agreed with the Council.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

SA 25 Cape Boards Site, Iver Lane Cowley

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA 25 is unsound as the policy criteria states that 'higher densities should be located adjacent to the canal'. The proposed number of dwelling units in the Site Information schedule could be achieved with a low rise suburban setting characterized by a mixture of two and three storey buildings across the site. A concentration of higher buildings adjacent to the canal would destroy the current attractive setting of the Grand Union. The stretch of canal next to the Cape Boards site shares many of the attributes of the tranquil tree lined stretch of canal found in the Cowley Lock Conservation Area immediately to the south.

The policy criteria also fails to make reference to the existing mature trees which line the towpath side of the site and are an important landscape feature which contribute to the character of the canal.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if

The policy statement requiring that 'higher densities should be located adjacent to the canal' should be deleted. The development principles should include the requirement

you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

that the development should preserve all the existing trees located along the eastern boundary with the Grand Union Canal.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to10MB)

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

SA 29 Trout Road, Yiewsley

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA 29 has not been positively prepared as the Site Information schedule is out of date (outline planning permission has already been granted for this site).

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Revision of the SA 29 Site Information schedule to reflect relevant planning history.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to10MB)

I am commenting on

Nothing selected

I am commenting on

Local Plan Part 2
Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number

SA 14 Royal Quay, Summerhouse Lane, Harefield

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policy SA 14 has not been positively prepared as the attached map is incorrect in that an outline planning application was submitted in May 2013 for a much larger area than shown outlined in red and permission was granted in October 2013.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

SA 14 Map to be updated and the relevant planning history in the Site Information schedule should be revised.

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DHMB 1, DMHB 6, DHMB 25, DME15 and DME 18

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Policies DHMB 1, DMHB 6, DHMB 25, DME15 and DME 18 are not effective as they fail collectively to provide a clear strategy to realise the potential of the canal network within the Borough for regeneration and recreation. The individual policies together with a number of Site Allocations along the canal present no clear vision for the ways in which the canal environment could be enhanced and where necessary protected.

Paragraph 5.1 of Policy DHMB 1 fails to record the Grand Union Canal, The Paddington Arm and the Slough Arm as Hillingdon Heritage Assets. Policies relating to the effect that development may have on heritage assets would therefore seem not to apply to the canal network within the borough.

The canal network in the Borough forms part of the Green Chain. Policy DME15: Development in Green Chains does nothing to ensure that the character of the canal is either protected or enhanced by adjoining development as it seeks only 'to maintain a visual and physical break in the built up area'. This is an entirely inadequate response to a unique canal environment that can so easily be threatened with destruction by insensitive or out of scale development.

Policy DHMB 25 relates to ten individual Conservation Areas already designated by the Council, which adjoin or include sections of the canal. The Council should resolve to designate the entire length of the Grand Union, Paddington Arm and Slough Arm within the borough as a Conservation Area. This would add a much-needed measure to protect the character of the canal and would be in line with adjoining London Boroughs (Ealing and Hounslow) who have already designated their entire canal network as Conservation Areas. All sections of the canal within the borough would meet Hillingdon eligibility criteria for the designation of a Conservation Area by achieving points for all the townscape and historical significance benchmarks.

Paragraph 5.25 of Policy DMHB 6 fails to take into account the need to consider development proposals on sites adjoining Conservation Areas to ensure that insensitive development does not affect the character of the Conservation Area. The wording of the Policy, which mentions new development 'on its fringes', is considered inadequate in dealing with this potential threat to the character of a Conservation Area.

The movement of boats is an essential feature of any canal environment that must be maintained. There is a danger otherwise that a canal becomes a sterile unconnected stretch of water and in urban areas simply a backdrop to expensive housing. It is evident that large numbers of boaters entering or exiting the canal system at Brentford move quickly through the southern part of the Grand Union to reach the more tranquil areas of the canal to the north of Harefield. Part 2 of the Local Plan does nothing to encourage boat movement on the Borough's urban canals. To achieve this the Local Plan needs to include policies that actively address the needs of boaters such as long-term leisure and residential moorings, boat service facilities and the provision of safe stopping points where boaters can use the facilities offered by the town centres of Uxbridge, West Drayton and Hayes. In Policies SA 19, SA 25 and SA 29 the rather vague requirement for 'canalside improvements to be agreed with the Council' needs revision to incorporate much more specific facilities for boaters (including dredging of mooring points if necessary). Policy DMHB25 seeks to control standards for moorings but there are no policies in place to promote the provision of moorings as part of regeneration development in urban areas.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Paragraph 5.1 of Policy DHMB 1 should record the Grand Union Canal, the Paddington Arm and the Slough Arm as Heritage Assets within the London Borough of Hillingdon.

Hillingdon have already designated a number of individual Conservation Areas along the canal and most of these include parcels of land to either side of the canal, which form an essential part of the character of the Conservation Area. A similar approach should be taken in designating the rest of the canal as a Conservation Area. The boundaries of the Canal Conservation Area should include not just the Canal and River Trust controlled water space and towpath but also other important features on private land adjoining the route of the canal, including landscape (mature trees, hedges reed beds etc.).

In addition Policy DHMB6: Conservation Areas should be

revised

From:

New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance its significance by making a positive contribution to its character and appearance.

To:

New development, including alterations and extensions to existing buildings, within a Conservation Area or on a site directly adjoining a Conservation Area, will be expected to preserve or enhance the significance of the Conservation Area by making a positive contribution to the character and appearance of the Conservation Area.

Policy DHMB 25 should be expanded with an additional paragraph to state that the Council will support the establishment of residential or leisure moorings as part of development in waterside locations provided that they satisfy the criteria above.

No

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Nothing selected
 First name
 Last name
 Address
 Postcode
 Telephone, including area code
 Email
 Organisation (if relevant) Mobile Operators Association (MOA)

Agent's name and address (if applicable)

Title Ms
 First name GINNY
 Last name HALL
 Address
 Postcode
 Telephone, including area code
 Email
 Company Mono Consultants Limited

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number
 Paragraph number 5.109
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Sound
 Prepared in accordance with the duty to cooperate, legal and procedural requirements?
 It has not been positively prepared
 It is not effective
 It is not justified
 It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The last sentence of paragraph 5.109 states:

"It is important to ensure that any equipment shares existing infrastructure and is of a suitable design taking into consideration heritage assets, height, scale and materials of the site and local area"

While both NPPF and the Code of Best Practice on Mobile Network Development in England both encourage mast and site sharing, there will be instances where it is not technically or operationally possible. This is confirmed in paragraph 43 of NPPF which states:

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

I am commenting on

Local Plan Part 2
Development Management Policies

To which part of the Local Plan Part 2 does this representation relate:

Policy number

DMHB26

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Criterion (ii) of Policy DMHB26: Telecommunications

Criterion (ii) of Policy DMHB26 states that telecommunications developments should not have a detrimental effect on the character or appearance of the building or local area. While it is confirmed within the Code of Best Practice that telecommunications developments should be sympathetically designed' the provision of advanced, high quality electronic communications infrastructure may, in some instances, result in some minor impacts. In these instances it is important that the visual impact of an installation is balanced against the Government's objective to; 'provide advanced, high quality communications infrastructure.' On that basis we suggest that Criterion (ii) of Policy DMHB26 is changed to:

"They do not have an unacceptable effect on the character or appearance of the building or the local area;"

Criterion (iii) of Policy DMHB26: Telecommunications

It is our considered opinion that additional clarity can be given to Criterion (iii) of Policy DMHB26 by changing the wording to:

"if proposing a new mast, it has been demonstrated that there is no possibility for use of alternative site, mast sharing and the use of existing buildings;

"Existing masts, buildings and other structures should be used, unless the need for a new site has been justified." In order to align Paragraph 5.109 with NPPF and the Code of Best Practice and accept the possibility of new sites being required, we suggest that the final sentence is changed to:

"It is important to ensure that any telecommunications developments are of a suitable design taking into consideration heritage assets, height, scale and materials of the site and local area."

No

Criterion (iv) of Policy DMHB26: Telecommunications

Criterion (iv) of Policy DMHB26 states that telecommunications development will only be permitted where there are details of frequency modulation, power output and evidence that the proposal meets the ICNIRP guidelines. While we accept that Annex F of the Code of Best Practice on Mobile Phone Network Development which was published in 2002 included a requirement for details of frequency modulation and power output to be submitted with planning applications for telecommunications developments; this requirement has been removed from the latest version of the Code of Best Practice which was published in 2013.

The revised Supplementary Information Template is included in Appendix E of the Code of Best Practice on Mobile Phone Network Development which was published in 2013. While it is still a requirement for the operators to provide confirmation that a development complies with the ICNIRP guidelines, there is no longer a requirement for them to provide details of frequency modulation and power output. On that basis, we request that Criterion (iv) of Policy DMHB26 is amended as follows:

“it includes a Declaration of Conformity with International Commission on Non-Ionizing Radiation Protection Public Exposure Guidelines.”

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

As an alternative to the amendments suggested above, another option would be to substitute the existing wording of Policy DMHB26 with the following wording:

“Proposals for telecommunications development will be permitted provided that the following criteria are met: -

(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;

(ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;

(iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.

(iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

No

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title Nothing selected
 First name Royal London (CIS) Ltd
 Last name
 Address C/O Agent
 Postcode
 Telephone, including area code
 Email
 Organisation (if relevant)

Agent's name and address (if applicable)

Title Mr
 First name Robert
 Last name Davies
 Address Gerald Eve LLP
 Postcode
 Telephone, including area code
 Email
 Company

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on Local Plan Part 2
 Site Allocations and Designations

To which part of the Local Plan Part 2 does this representation relate:

Policy number SA18
 Paragraph number
 Table or figure number
 Map number (Atlas of Changes)

Do you consider that the Local Plan Part 2 is

- Sound
- Prepared in accordance with the duty to cooperate, legal and procedural requirements?
- It has not been positively prepared
- It is not effective
- It is not justified
- It is not consistent with National policy

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

At Appendix A, we attach a plan which details the part of Site Allocation 18, Chailey Industrial Estate, which is within our client's, Royal London (CIS) Ltd, ownership. This plan was also submitted within our representations, on behalf of our client, in response to the Hillingdon Local Plan Part 2 Call for Sites in May 2013. The majority of the site is vacant.

At Appendix B, we attach a plan which shows the extent of draft Site Allocation 18, which is outside our client's ownership. This part of the site is owned by Marley Pensions Limited and is currently occupied by the retailer, Matalan, on a long leasehold to 2026.

Site Allocation 18 states that "The Chailey site is currently vacant". The Chailey Industrial Estate site detailed within the Appendix A plan, is vacant, however the Matalan site is not, therefore this statement is factually incorrect.

These two sites are within separate ownerships and are in very different situations in terms of occupation. We consider that either a separate Site Allocation is required for each site or, the Matalan site should be removed from the Site Allocation Document all together. Due to the long leasehold arrangement, the Matalan site is unlikely to be brought forward for redevelopment.

Royal London (CIS) Ltd control their site, however the Matalan site is in separate ownership and due to the length of the lease remaining as well as a successful tenant and employment use, the Matalan site will not be deliverable as part of a comprehensive redevelopment of the whole site, as detailed in the Site Allocation 18. This site should be removed from Site Allocation 18.

Chailey Industrial Estate, as detailed in the plan attached at Appendix A, is predominantly vacant. This site is in urgent need of regeneration, as recognised by London Borough of Hillingdon, and requires a positive planning framework and policy in order to be able to deliver a successful scheme.

The current wording of the policy states that 50% of Site A should be brought forward for residential development and therefore the remaining 50% should therefore be brought forward for employment generating uses. The policy wording also states that 40% of Site B should be used for employment generating uses. Considering the plan attached at Appendix B, the Matalan site covers approximately 40% of draft allocation Site B. The remaining 60% could therefore be assumed to be brought forward for residential development. If a scheme was developed as per this current wording, the site coverage would result in mix between residential and employment uses, in strips across the site. This is an inefficient, impractical and illogical way of a site being developed. Accordingly, the wording of Site Allocation 18 would not result in a deliverable development scheme.

On numerous occasions throughout 2013 and 2014, we tried to contact both planning and housing teams at the London Borough of Hillingdon to discuss the Site Allocation Document, and what we considered to be an error in the preparation of the plan following the first period of consultation in 2013.

In summary, due to the separate ownership structures of Royal London (CIS) Ltd's site, and the Matalan site, these sites should not be included within a single site allocation. Either the Matalan site should be removed from Site Allocation 18, or should be removed as a site allocation all together.

We consider that the Local Plan Part 2 is not legally sound due to the following reasons.

1. Positively Prepared

The NPPF states that the plan should be prepared based on a strategy which seeks to meet objectively assessed development infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

We do not consider that this element of the plan has been

prepared based on a strategy which seeks to meet objectively assessed development infrastructure requirements, as the retail site, Matalan, is highly unlikely to come forward for redevelopment within the plan period.

Furthermore, if both sites were built out in the way the policy suggests they should be, there would be bands of residential and employment uses across the eastern and western sides of the site. This would be an extremely inefficient, impractical and illogical way of developing the site and would lead to a layout and format of uses that would not necessarily be incompatible with each other.

2. Justified

The NPPF states that the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

We do not consider that the most appropriate strategy for this site has been considered. In our view the most appropriate strategy and, most reasonable alternative, for the site would be to exclude the Matalan site from the Site Allocation Document so that the remainder of the Site Allocation is deliverable and can be brought forward imminently. The Matalan retail store is trading successfully and is on a long lease to 2026. It is unlikely to come forward for redevelopment, and is therefore considered unsuitable to be included within the Site Allocation.

3. Effective

The NPPF states that the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

We do not consider that this allocation is deliverable. The Matalan site is unlikely to be brought forward for redevelopment within the plan period and this means the delivery, and redevelopment, of the remainder of the site is not feasible.

Paragraph 173 of the NPPF states that "sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened."

If a scheme was brought forward for development of the site in accordance with the current wording of Site Allocation 18, the site coverage would result in mix between residential and employment uses, in strips across the site. This is an inefficient, impractical and illogical way of a site being developed. Accordingly, the wording of Site Allocation 18 would not result in a deliverable development scheme.

The plan only has to fail on one of the three tests noted above and therefore we consider that the Site Allocations Document is unsound.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

In the most part, the wording of Site Allocation 18 has not been altered since the first round of consultation in 2013. Furthermore, the plan included within SA18 has remained the same. As set out above, this is not deliverable.

We support the removal of the sentence "whilst the site is proposed to be removed from the IBA it continues to be surrounded by employment generating uses", as, whilst this statement is factually correct, it is of no relation to the future development potential of the site. In addition, we also support the removal of specific reference to "B1 and suitable B2 uses", as the employment generating uses proposed will be dependent on demand from the market and community need and will be set out in any future proposals.

We consider that any reference to density should be removed from Site Allocation wording. Furthermore the density proposed for the site is significantly below its potential capacity. Within the Site Allocation wording, a development density of 110 units per hectare is sought and the site information states that 150 units could be developed on the site. The GLA Housing SPG states that in urban locations with a PTAL rating of 2-3 (of which the site is a PTAL rating 3) sites can achieve up to 170 units per hectare. In accordance with this, and with an amended site area of 1.82ha (excluding the Matalan site), the Chailey Industrial Estate site has the realistic potential to provide at least 310 units, in accordance with the GLA guidance. However we do not consider that a specific number of units should be allocated, but instead the density levels be negotiated and agreed as part of the planning application process.

We also consider that the site information designation of "Industrial Business Area" should be removed as, according to Atlas of Changes Map 1.1(v), the site can now be removed from this employment area.

We consider that the Matalan site should be removed from Site Allocation 18, and the following Policy wording substituted:

"The Chailey site is currently vacant and provides an opportunity for mixed use development to enhance Hayes town centre. The following development principles will apply:

- The site will be allocated for housing-led development, with a range of complimentary employment generating uses;
- The Council will seek to achieve a proportion of community infrastructure on the site to assist in the regeneration of Hayes;
- Proposals should be provided to a high quality design;
- Open space and amenity space should be provided in accordance with Council standards; and
- Proposals should meet the provisions of the relevant policies in other parts of the Local Plan."

We consider that the Matalan site should be removed from Site Allocation 18, and the following Policy wording substituted:

Site Name: Chailey Industrial Estate, Pump Lane

Ward: Townfield

Location: Chailey Industrial Estate, Pump Lane

Area (ha): 1.82ha

PTAL Ratings: 3

Proposed Development: Mixed use development

Designations: None

Existing Use: Predominantly Vacant Industrial buildings

Relevant Planning History (most recent): No relevant planning history

Proposed Number of Units: To be negotiated as part of any planning application

Existing Units: 0

Net Completions: 300+ Units

Infrastructure Considerations: To be negotiated as part of any planning applications

Indicative Phasing: 2016-2021

Other Information: The Chailey Industrial Estate provides an opportunity to enhance Hayes town centre through a site allocation policy for development post 2016 in the forthcoming LDF. The rest of the area should be re-designated as a Locally Significant Industrial Location and part of the Hayes Industrial Area – Preferred Industrial Location. Site is identified in Hillingdon’s Employment Land Study.

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider it necessary to participate in the oral part of the examination as our reasoning behind the amendments we consider are required to this policy would be easier to present orally.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Appendix A - Chailey Industrial Estate (Royal London (CIS) Ltd's Ownership).pdf
Appendix B - Matalan Site (Marley Pensions Limited).pdf

I am commenting on

Local Plan Part 2
Policies Map (Atlas of Changes)

To which part of the Local Plan Part 2 does this representation relate:

Policy number

Paragraph number

Table or figure number

Map number (Atlas of Changes)

Map 1.1 and Map 1.1(v)

Do you consider that the Local Plan Part 2 is

Sound

Prepared in accordance with the duty to cooperate, legal and procedural requirements?

If you consider the Local Plan Part 2 to be unsound, indicate your reasons

It has not been positively prepared

It is not effective

It is not justified

It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

On behalf of our client, Royal London (CIS) Ltd, we support Atlas of Changes Map 1.1 and Map 1.1(v). We consider the removal of Chailey Industrial Estate from the Industrial Business Area, and subsequent Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Locally Significant Employment Sites (LSES), necessary in order for the site to be brought forward as part of a residential-led mixed use development.

Please also refer to our responses in respect of Site Allocation 18.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

Yes

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

We consider it necessary to participate in the oral part of the examination as our reasoning behind the amendments we consider are required to this policy would be easier to present orally.

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

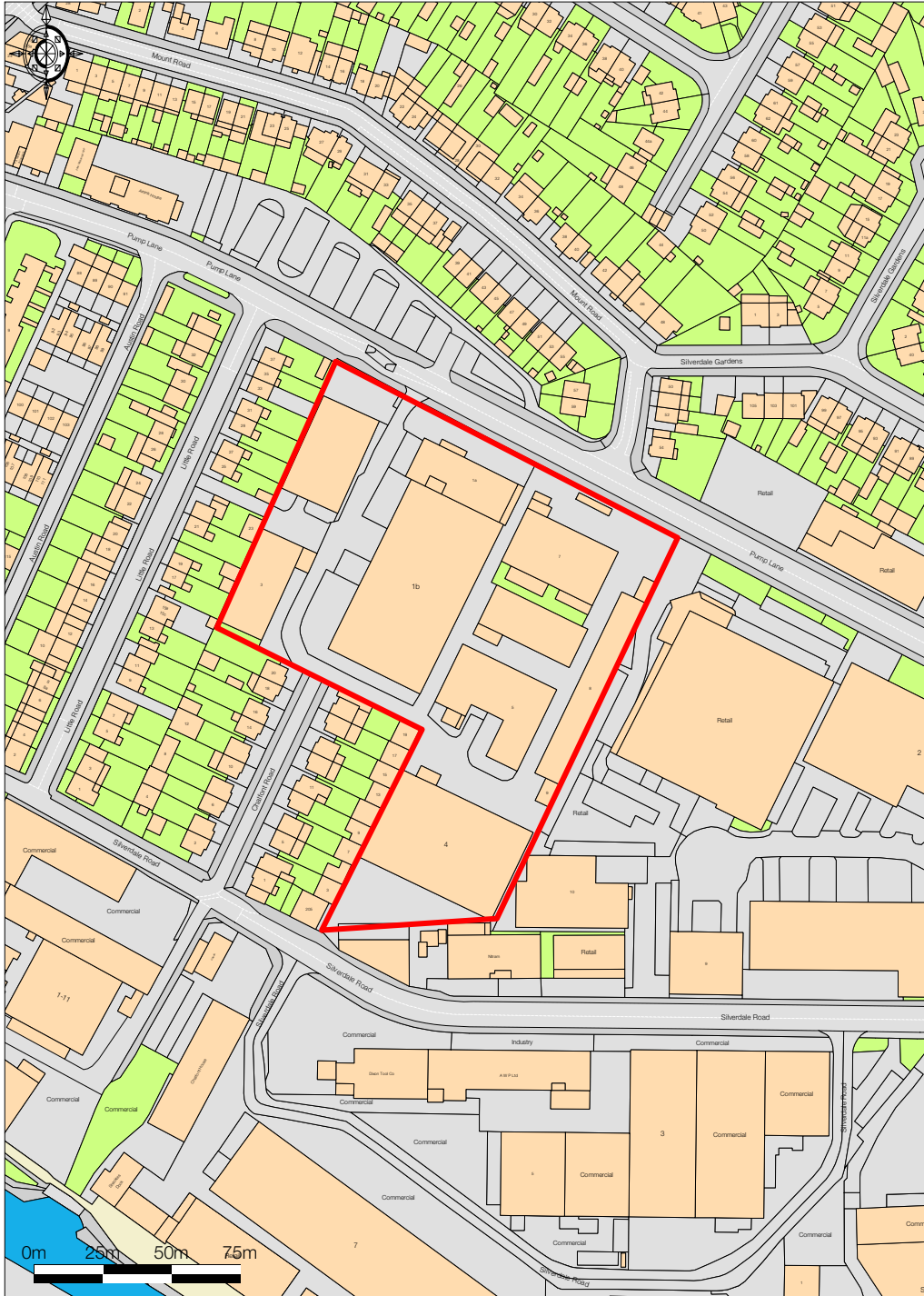
Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



Appendix A –
Chailey Industrial Estate
Royal London (CIS) Ltd's Ownership



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NTH/RJLD/HBR/J5935



Appendix B - Matalan Site (Marley Pensions Limited's Ownership)



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NTH/RJLD/HBR/J5935

Our Ref: 5334

Your ref:



4th November 2014

Planning Policy Team
3N/02
Residents Services
Civic Centre
High Street
Uxbridge
UB8 1UW



Dear Sir/Madam

Re: Hillingdon Local Plan Part 2 – Site Allocations and Designations

The Elms, 371A High Street, Harlington, UB3 5EE

I am writing to you on behalf of my clients, The Elms Estate Harlington LLP, to make representations relating to the Council's Local Plan, Part 2: Site Allocations and Designations Proposed Submission Version (September 2014).

Background

My clients are the owners of the land at The Elms which is an area directly to the east of Harlington High Street. This area, historically known as Palmers Farm, is comprised of a number of buildings and hardstandings, predominantly in commercial use.

Following negotiations and discussions with planning officers at the London Borough of Hillingdon, retrospective planning approval was granted for a range of commercial uses at the site of The Elms in June 2014. These applications sought to regularise the existing uses of the units, the majority of which have been occupied and in active employment use since the 1980s. In addition to establishing the lawfulness of the use of the premises currently in use, planning consent was also granted for the change of use of vacant units to provide for a range of appropriate uses throughout the complex. The result was that the lawful



use of the premises is now established and that the businesses present can continue trading from their existing premises without the threat of enforcement action.

Nine separate planning permissions were granted in June 2014 for a range of uses of the site which formally established the commercial use of the buildings. These include the following planning consents:

- Planning permission: 19758/APP/2014/823
Change of use of Unit 1 to mixed use, including offices (Class B1a) and storage & distribution (Class B8) (Retrospective application).
- Planning permission: 19758/APP/2014/835
Change of use to dog grooming (Class sui generis), (Retrospective application).
- Planning permission: 19758/APP/2014/834
Change of use to food preparation with no retail or sales element (Class B1c) (Retrospective Application).
- Planning permission: 19758/APP/2014/833
Change of use of premises offices (Class B1a) and/or storage & distribution (Class B8)
- Planning permission: 19758/APP/2014/831
Change of use of premises from to retail (Class A1) and ancillary storage (Class B8), (Retrospective Application)
- Planning permission: 19758/APP/2014/838
Change of use of vacant, former agricultural building to use for packaging, storage and pallet manufacture (Class B2- General Industrial)
- Planning permission: 19758/APP/2014/828
Change of use of premises from storage and packaging of materials (Class B2/B8), to light industrial (Class B1c), and ancillary storage (Class B8) (Retrospective application)
- Planning permission: 19758/APP/2014/791
Change of use of existing building to meat cutting, packing and distribution (Class B2) (Retrospective application) - 19758/APP/2014/791
- Planning permission: 19758/APP/2014/826
Change of use of Unit 9 to storage and distribution (Class B8), (Retrospective application)

The effect of these planning permissions has been to regularise previously unauthorised uses and to establish new uses in other units which were previously vacant.

The commercial site is identified in the annotated aerial photograph contained in Appendix 1 as 'Site 1'. In addition to this, the existing dwelling on land immediately to the north of The Elms complex (site 2), is also

the subject of these representations since it is considered that both sites should be excluded from the Green Belt due to their developed character and the potential that both have to provide land for new development. Site 2 is currently in residential use and functions as a separate planning unit from the commercial site immediately to the south.

Scope of Representations

These representations are submitted in order to highlight the absence of any housing allocations at Harlington, and more specifically the absence of the site at The Elms from the sections of the document entitled:

- New Homes; or
- Rebalancing Employment Land.

In addition, there is no reference to this site in the section entitled: 'Green Belt; Metropolitan Open Land; Green Chains - List of Proposals.' It is considered that given the ongoing presence of long-established commercial uses throughout the site, the fact that it immediately adjoins the existing settlement and that it is developed rather than open in character, that the site at The Elms should be excluded from the Green Belt.

These representations therefore seek the inclusion of an additional policy within the section entitled 'New Homes', as a new policy following on from Policy SA 32, allocating the site at The Elms as a residential development opportunity, and the addition of this site as the fourth in the list of Green Belt Deletions. In light of the current status of the site as Green Belt, it is also proposed that an additional Green Belt Deletion is added to the section entitled Green Belt; Metropolitan Open Land; Green Chains; Nature Conservation, following on from the proposed Green Belt Deletions at 470 Bath Road, Longford, Former Perry Oaks Sludge Works, Heathrow, and Land at Stockley Road adjoining the Grand Union Canal, Hayes.

The continued application of the Green Belt designation at The Elms appears is as a result of a failure to consistently apply the criteria used to review the Green Belt boundaries in the Borough. In addition, the absence of any new housing allocations in the village of Harlington is of particular concern given that the prospect of future development in the village is constrained by the presence of the Green Belt which are drawn tightly around the existing limits of development. This is particularly the case to the east of the settlement. Given the approach taken to the revision of the Green Belt boundaries elsewhere in the district it is our client's view that there has not been a consistent approach taken throughout the review of sites which do not serve the purposes of Green Belt land as defined by the NPPF.

This letter is submitted in order to promote the development of land at The Elms as an opportunity to extend and consolidate the existing settlement at Harlington in a manner which makes effective use of previously developed land and which takes account of and provides for the longer-term housing needs of both the London Borough of Hillingdon and the wider area.

It is acknowledged that the site is currently designated as Green Belt, which reflects the historic status of the land and its relationship to the settlement of Harlington. However, given the close proximity to and relationship with the existing settlement, the site is considered to represent a logical extension of Harlington which should be included within a revised settlement boundary along with other land to the north which itself provides an opportunity to extend the extend of development at the village.

Notwithstanding the position that Hillingdon is able to demonstrate that it can provide sufficient land to meet housing delivery targets (based on an average annual rate of dwelling provision of 425 dwellings per year), the failure to critically examine the continued designation of previously developed sites in the Green Belt (including that at The Elms), represents a major shortcoming of the current document. In the context of the Government's stated intent to significantly boost the supply of housing, the failure to recognise the potential of developable land and revise the settlement boundaries accordingly is considered to represent a failure on the part of the local planning authority to meet its obligations to plan positively and take into account unmet development needs from neighbouring authorities.

Green Belt Policy

The NPPF represents the starting point for examining whether the current Green Belt boundaries should be reviewed. Paragraph 83 of the NPPF confirms that it is the role of the Local Plan process to critically examine the role of the Green Belt and seek to ascertain whether the existing boundaries are appropriate in light of changes in circumstances since the Green Belt boundaries were defined. The key considerations outlined in Paragraph 83 are whether the boundaries are sufficiently defensible to be of permanence. Paragraph 83 reads as follows:

"Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

It is evident from the current position of the Green Belt boundaries to the east of Harlington that these do not necessarily correspond with permanent, defensible boundaries. The absence of this site from the list of proposed Green Belt Deletions on (Page 103 of the Submission Draft Local Plan Part 2 document), is

therefore inconsistent with the requirement for Green Belt boundaries to reflect features of particular permanence. It is therefore proposed that the current boundary is revised to the effect that the land at The Elms is excluded from the Green Belt.

The requirement for boundaries to be clearly defined and to correspond to readily recognisable physical features is set out in Paragraph 85 of the NPPF which reads as follows:

“When defining boundaries, local planning authorities should:

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Each of the above considerations are pertinent to the application site.

In relation to the first bullet point, it is illogical in light of the established commercial uses at the site of The Elms for these to remain within the Green Belt. It is acknowledged that the Local Plan does not propose additions to the existing settlement at Harlington in the form of allocations for new housing or commercial development. The general direction of the Part 1 Local Plan is to retain the general extent of the Green Belt in the area to the north of Heathrow and more generally not to consider major adjustments to Green Belt boundaries to accommodate growth. However, Paragraph 8.24 of the Part 1 Local Plan states that: *“minor adjustments to the boundary will be undertaken in the Hillingdon Local Plan Part 2 – Site Specific Allocations Local Development Document (LDD).”* This is entirely the approach that is being advocated in the Part 1 Local Plan.

Of particular importance is the second bullet point, which directs local planning authorities to not include land within the Green Belt that it is unnecessary to keep permanently open. On this basis, it is clear that

the Green Belt designation which currently applies to The Elms should be removed since the land clearly no longer retains an open character. The presence of buildings and hardstandings throughout the site reflects the previous and current uses which are all now established as lawful following approval of planning consent for the retention of the existing commercial operations.

Bullet points three and four which relate to safeguarded land are clearly of less relevance, however, bullet point 5 outlines a matter which needs to be given careful consideration. The local planning authority are required to examine whether the Green Belt boundaries would need to be altered at the end of the plan period and, given the age of the buildings at The Elms and the nature of the uses it is unclear whether this area would remain in active use in perpetuity. The prospect of the site becoming derelict in the medium-to-longer term would result in pressure for redevelopment for alternative uses which would not be compatible with the continued Green Belt designation. Since both areas no longer have an 'open' character, neither fulfils the purposes of the Green Belt as outlined in Paragraph 80 of the NPPF, and these characteristics would continue to decline in terms of their relevance in the longer term.

Finally, as referred to above, the absence of clearly defined boundaries which relate to readily recognisable physical features and which have a degree of permanence is clearly contrary to the requirement in bullet point six that requires Green Belt boundaries to correspond to features which would represent permanent limits to the extent of development. The Green Belt boundary currently runs along the western boundary of The Elms, excluding the residential properties in Harlington to the west of this from the Green Belt, whilst the designation continues to apply to the commercial buildings and residential properties. The position of the boundary as shown on Map A3.12 does not correspond with the extent of development to the east of Harlington which is more clearly defined by the limits of the buildings and hardstandings at The Elms. It is therefore considered that these clearly recognisable and permanent physical features would represent a more appropriate position for the Green Belt boundary, and it is proposed that this is amended to exclude both areas from the Green Belt and include these within the inset area of Harlington.

It is acknowledged that the continued relevance of the land at The Elms to meeting the objectives of the Green Belt was considered as part of the update to the Council's Green Belt Assessment published in September 2013. In considering the site against the five purposes of the Green Belt, as set out in Paragraph 80 of the NPPF, the Council considered that the site does not serve the following purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns;

However, the latest version of the Council's Green Belt Assessment concluded that the site does meet one of the five purposes of Green Belt land. The extract from this part of the evidence base (included within Appendix 2) states that:

"There are other alternative sites available which would encourage the recycling of other derelict or urban land. The site therefore merits its current Green Belt designation."

Despite this assessment, it is not considered that the development of land at The Elms would compromise the overarching objectives of the Local Plan or more specifically would prevent previously developed land coming forward for development elsewhere which is integral to urban regeneration initiatives. Contrary to these findings, it is considered that the use of a previously developed site would facilitate and complement the regeneration of Harlington providing opportunities for new development in an area where none is currently proposed during the plan period, and where the Green Belt boundaries correspond with the existing limits of development. Without additional sites such as that at The Elms, there is insufficient capacity within Harlington to meet local needs for housing and continue to provide for the managed expansion of the settlement.

The Green Belt Assessment (last updated in September 2013) has overstated the role of the site at The Elms, and indeed others, in encouraging the recycling of derelict and other urban land. This was the only one of the five purposes of the Green Belt that this site was considered to be consistent with. The limited size of the site would mean that its redevelopment for housing would not be of a sufficient scale that it would compromise the delivery of other regeneration initiatives elsewhere. In addition, it is not considered that the existence of other sites which provide opportunities for recycling of derelict land is sufficient justification for retaining a site within the Green Belt. The retention of the existing designation would place unnecessary restrictions on the future expansion or consolidation of operations and prevent the redevelopment and recycling of this land should the existing uses cease and render the site functionally obsolete.

It is important to note that since the publication of the latest Green Belt Assessment in September 2013, the lawful use of the site for a range of commercial uses has become established through the approval of planning permission in June 2014. This reflects a material change in circumstances that formally recognises and establishes the presence of these commercial uses, which represent inappropriate development in the Green Belt, as opposed to the previous lawful use of the site for agriculture which would not in itself be inappropriate development in the Green Belt.

It is also notable that the redevelopment of the site would not in itself represent inappropriate development in the Green Belt. Such a proposal would be considered as an exception to the presumption

against new buildings in the Green Belt (on the basis that this represents inappropriate development), as set out in Paragraph 89 of the NPPF. Specifically, it would fall within the definition set out in Bullet Point 6 of Paragraph 89 which states that the following represents such an exception:

“limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”

Given this situation, it would be illogical to continue to apply the Green Belt designation to this site when the prospect of redevelopment (on the basis that there would not be a greater impact on openness than at present), would not be prevented by the presence of the designation. On this basis, the continued presence of the Green Belt designation would fail to provide sufficient permanence and would prevent the site from being recognised as the development opportunity and a logical extension of the settlement to the east of Harlington to accord with the extent of land and buildings with a clear functional relationship to the village.

In light of the above considerations, it is considered that the continued presence of the Green Belt designation at The Elms would not be consistent with the objectives of the NPPF, and that these would be better achieved through the revision of the current Green Belt boundaries to exclude the land and buildings at The Elms to the east of Harlington which are currently in residential and commercial use. This would ensure that the Green Belt boundaries reflected the logical extent of the settlement including all residential and commercial uses, and lead to a greater degree of consistency with the permanent physical features which mark the extent of development in this area.

There is also potential to provide for longer-term development needs in the village and in the south of the Borough through the identification of land immediately to the north of The Elms as safeguarded land. The extent of this land and its relationship to Sites 1 and 2 at The Elms, is shown on the annotated aerial photograph enclosed at Appendix 3.

New Homes

Section 3 of the Local Plan: Part 2 - Site Allocations and Designations (Pages 13 – 82), identifies and allocates land for up to 6044 dwellings on a total of 35 sites throughout the Borough. A number of these sites represent major redevelopments of redundant, former employment sites in order to provide housing. These representations are not seeking to challenge the merits of these developments in their own right but to recognise that an appropriate balance needs to be found in terms of housing provision throughout the Borough. The absence of any allocations in Harlington, or indeed elsewhere in the south of the

Borough, indicates that the future development needs of a settlement which is highly constrained by the tightly drawn Green Belt boundaries are not adequately provided for.

The absence of an acknowledgement of the role of Harlington as a location for new development fails to recognise the benefits of providing new housing in areas which are in close proximity to existing employment areas and those locations where it is anticipated that there will be significant growth in jobs (i.e. the Heathrow Opportunity Area and Hayes/West Drayton Corridor). Whilst it is recognised that Harlington is among the smaller settlements in the south of the Borough, it clearly has potential to provide additional homes in locations close to employment opportunities which are well-served by public transport links (as highlighted in the accompanying Transport Statement). The allocation of new housing sites in Harlington would reduce the need to travel and commuting distances between homes and employment areas, which would represent a sustainable pattern of development in the context of the Borough.

It is therefore considered that the lack of recognition afforded to the development potential of Harlington represents a failure to plan positively for growth throughout the Borough and maintain an appropriate balance between the locations of new homes and new jobs. In this respect, the Part 2 Local Plan is not considered to be “sound”.

It is also unclear whether adequate consideration has been given to meeting unmet housing need arising elsewhere within the wider housing market area. The location of Hillingdon at the western edge of Greater London means it can be considered in the context of local planning areas beyond the administrative extent of London. The neighbouring Boroughs of Spelthorne (Surrey), Slough (Berkshire), and South Bucks (Buckinghamshire), are all areas where the pressure for housing provision is particularly acute which like the London Borough of Hillingdon are constrained by Green Belt. Unlike the area adjoining the current limits of Harlington, these areas are subject to additional physical constraints to the provision of land for new housing, including flood risk, landscape and other environmental designations which severely limit their capacity to provide new housing sites.

Given the relationship between the London Borough of Hillingdon to these areas, it is considered that a more critical analysis of the potential of land within the Borough to provide new housing is needed in order to satisfy the duty to co-operate with neighbouring local authorities. It is not sufficient for the Hillingdon Local Plan to merely satisfy its own requirements for housing provision which incidentally have not been verified through the production of an up-to-date assessment of housing need. Therefore, where there are new opportunities for the provision of housing on sites which are not currently allocated, these should be identified and allocated accordingly in order to provide additional land for new housing unless other physical constraints demonstrate otherwise.

Whilst the site at The Elms may (as highlighted above), represent an exception to the presumption against new buildings in the Green Belt, other comparable sites which may also represent appropriate sites for new housing may not be able to come forward given the restrictive position of the Green Belt in relation to new buildings. It is therefore considered that the full potential of sites which could contribute towards meeting unmet housing needs beyond the boundaries of the London Borough of Hillingdon have not been fully explored. In this regard, it is considered that greater consideration should be given to identifying and allocating unconstrained sites, particularly where these represent previously developed land. Whilst the Local Plan anticipates a significant number of homes being provided as windfalls (consistent with past trends), it is considered more appropriate for the Local Plan Part 2 to recognise all opportunities for residential or mixed use development and allocate these where these are appropriate sites for housing.

It is considered that both the additional housing allocations identified above and greater flexibility in terms of accommodating housing growth in Harlington are required in order to provide for a significant boost in the housing supply (as required by Paragraph 47 of the NPPF). Without these provisions, Part 2 of the Local Plan is not considered to be “sound”.

Rebalancing Employment Land

Pages 83 – 100 of the Local Plan Part 2 – Site Allocations and Designations identifies three categories of employment land allocations which are either to be retained throughout the Local Plan period or released for alternative uses. Should it be desirable to retain an element of employment within the site then it is considered that a mixed use development could be accommodated, providing for new residential development alongside office or small-scale retail uses (given the established use of some areas of the site as retail units), which would be more compatible with the position of the site in such close proximity to existing residential uses.

The redevelopment of the site for a mix of uses would provide for tangible benefits in terms of environmental quality and the relationship to neighbouring residential properties. In the event that the retention of an element of employment at the site is considered preferable to a development consisting entirely of housing, it is considered that an appropriate mix could be provided that would better reflect its position in relation to the settlement and the nature of the neighbouring uses.

Development Potential of The Elms

The two areas of land identified on the enclosed plan (Appendix 1), include the existing commercial site (Site 1), extending over an area of 0.6 hectares, and the existing residential use with associated outbuildings on land immediately to the north (Site 2). Both of these sites provide opportunities to extend

and add to the limits of the existing settlement in a sustainable and logical manner. Whilst at present the various commercial uses and the existing residence remain in situ and are lawful uses carried on in close proximity to Harlington High Street, this land represents an opportunity to provide alternative uses which would better accord with the existing pattern of development. The enclosed plan at Appendix 3 illustrates how the proposed revision of the Green Belt boundaries would alter the extent of development to the east of Harlington and ensure that it corresponds to the physical limits of development rather than arbitrarily cutting across the limits of the site. The proposed position of the boundary would accord with clear physical features of real permanence in accordance with Paragraph 83 of the NPPF.

The revision of the Green Belt boundary as shown in Appendix 3 and described above would facilitate the redevelopment of the site at The Elms in a manner which would be complementary to the existing settlement. This would enable a limited extension of the existing limits of the settlement as defined by the current position of the Green Belt boundary. Such an approach could provide a source of land for new housing, commercial development or a mix of residential and commercial uses commensurate with the location. Whilst the Local Plan Part 1 does not recognise the development potential of Harlington, it is considered that there will be a need for land to provide new housing in appropriate locations within or adjoining existing settlements. In this instance, the presence of existing buildings and hardstanding presents a source of previously developed land which immediately adjoins the settlement to the east and represents an ideal opportunity for the provision of new housing.

Other than the Green Belt designation, the site is unconstrained by the presence of physical barriers to its redevelopment. Its position immediately adjacent to existing areas of housing suggests that this land would be an ideal location for residential development. The following paragraphs outline why this site would be appropriate for redevelopment.

i) Access and Parking

The accompanying Transport Statement prepared by Development Transport Planning confirms that the redevelopment of both areas of land at The Elms would not result in adverse impacts resulting from additional traffic volumes. The presence of existing employment uses provides a context and a baseline level of traffic using the site which would not be exceeded if the site was redeveloped for housing at a density of approximately 30 dwellings per hectare. It is notable that in terms of traffic generation the site can accommodate a greater number of dwellings without adverse impacts on vehicle circulation or parking. The latter would be accommodated within the site, with the location of vehicle parking spaces being subject to detailed design considerations that would be determined as part of a planning application.

ii) Archaeology

The extract from the Local Plan Proposals Map (Appendix 4), which relates to Harlington confirms the presence of an Archaeological Priority Area and an Archaeological Priority Zone which extends throughout Harlington and includes the site at The Elms.

Whilst these areas have been identified as a potential archaeological resource, there is little prospect of any active investigation into its potential without the redevelopment of the area. The form of any redevelopment would ultimately be influenced by the presence or otherwise of any features of archaeological interest.

Any redevelopment proposal will include measures to preserve any features of archaeological interest.

iii) Residential Amenity

The proximity of the existing commercial uses to existing dwellings suggests that there are opportunities to improve this relationship through the redevelopment of the site in a manner that would provide uses that are more consistent with a predominantly residential area. Whilst there is clear separation between the existing housing to the west of The Elms, the redevelopment of the existing commercial area would inevitably result in improvements to the relationship between the residential and non-residential uses.

iv) Impact on Character and Appearance

Any development of both sites at the Elms would be of a scale and nature which is comparable to the existing buildings present on the site. In landscape terms, any such developments would be well-contained and not clearly visible from beyond the limits of the settlement. Any redevelopment proposals would be considered in the context of the existing commercial uses which are of limited architectural merit. In terms of the design and external appearance of the buildings and the relationship with the areas within the limits of the settlement further to the west, the redevelopment of the site would be likely to achieve significant improvements to the quality of the environment at The Elms.

v) Trees, Landscape and Ecology

The boundaries of the site at The Elms are lined with mature trees and hedgerows. There are also a number of trees. There are also a limited number of trees within the area identified as Site 2. A Tree Preservation Order Area covers part of the site, although the position of the trees does not preclude development since these would be retained as part of any redevelopment scheme.

In landscape terms, the site is well-contained and the redevelopment of the site for housing would not result in any adverse visual impacts. Indeed, a residential development would present clear benefits in terms of the external appearance of the buildings.

As a previously developed site, the site has a low ecological value. However, there are a limited number of features (including a pond within the grounds of the existing dwelling at Site 2), which may support protected species. An ecological assessment would be undertaken prior to the submission of a planning application for the redevelopment of the site.

vi) *Flooding and Drainage*

The site is within Flood Zone 1, which has the lowest probability of flooding. There are therefore no constraints to the development in terms of flood risk.

Proposed Changes

In light of the shortcomings highlighted above, it is proposed that the Part 2: Local Plan should be amended as follows:

- Add Policy SA33: The Elms, Harlington (As per Appendix 1 – enclosed)
- Add Green Belt Deletion 4: The Elms, High Street, Harlington (As per Appendix 2 – enclosed)

Based on the format of the existing policies and proposals as set out in the Local Plan Part 2, the proposed additional policies and proposals should take the form of that set out below:

POLICY SA33 – NEW HOMES

To follow Policy SA 32: St. Andrew’s Park – Annington Homes Site (Page 81).

POLICY SA 33: The Elms, High Street, Harlington

The existing commercial buildings will be redeveloped to provide a development of 30 dwellings or a mix of housing and employment uses which are compatible with the predominantly residential character of Harlington. The removal of the Green Belt designation reflects the presence of commercial and retail uses adjoining residential areas to the east of High Street Harlington. The Council supports the redevelopment of the site along with associated environmental and access improvements.

Site Information

Site Name	The Elms, High Street, Harlington
Ward	Heathrow Villages

Location	High Street, Harlington
Area (ha/sqm)	0.92 ha
PTAL Rating	4
Proposed Development	Residential/Residential led mixed-use
Designations	Archaeological Priority Area Archaeological Priority Zone
Existing Use	Commercial/retail (use classes B2, plus B1, B8, A1 and sui generis); plus existing residential use (Class C3)
Relevant Planning History (Most Recent)	June 2014: Change of use of Unit 1 to mixed use, including offices (Class B1a) and storage & distribution (Class B8) (Retrospective application); Change of use to dog grooming (Class sui generis), (Retrospective application); Change of use to food preparation with no retail or sales element (Class B1c) (Retrospective Application); Change of use of premises offices (Class B1a) and/or storage & distribution (Class B8); Change of use of premises from to retail (Class A1) and ancillary storage (Class B8), (Retrospective Application); Change of use of vacant, former agricultural building to use for packaging, storage and pallet manufacture (Class B2- General Industrial); Change of use of premises from storage and packaging of materials (Class B2/B8), to light industrial (Class B1c), and ancillary storage (Class B8) (Retrospective application); Change of use of existing building to meat cutting, packing and distribution (Class B2); Change of use of Unit 9 to storage and distribution (Class B8), (Retrospective application).
Proposed Number of Units	30
Existing Units	1
Net Completions	29 units
Infrastructure Considerations	To be negotiated as part of any planning application
Indicative Phasing	2016 – 2021
Other Information	None

**PROPOSED GREEN BELT DELETION (WITHIN CHAPTER: GREEN BELT; METROPOLITAN OPEN LAND;
GREEN CHAINS; NATURE CONSERVATION**

To Follow Proposed Designations as set out on Page 82:

PROPOSED DESIGNATIONS

GREEN BELT DELETIONS	1.	470 Bath Road, Longford
	2.	Former Perry Oaks Sludge Works Site, Heathrow
	3.	Land at Stockley Road adjoining the Grand Union Canal, Hayes
	4.	The Elms, High Street, Harlington

To follow details of Proposed Green Belt Deletion: 3) Land at Stockley Road adjoining the Grand Union Canal, Hayes (Page 107).

4). The Elms, High Street, Harlington

Recommendation:

Delete from the Green Belt

Reason for Recommendation: The commercial site does not merit its current Green Belt designation and should be deleted from the Green Belt. The current Green Belt boundary does not reflect or correspond to the eastward extent of the village of Harlington. The site is separated from the main area of Green Belt to the east of The Elms by lines of mature hedgerows which provide permanent defensible boundaries that clearly define the limits and extent of development.

The site does not meet any of the purposes of including land in the Green Belt as identified in the NPPF at Paragraph 80, e.g. it does not:

- Check the unrestricted sprawl of large built-up areas;
- Prevent neighbouring towns merging into one another;
- Assist in safeguarding the countryside from encroachment; or
- Preserve the setting and special character of an historic town.

The eastern boundaries of the Elms represent a more logical and definable Green Belt boundary at Harlington.

Conclusions

In light of the considerations outlined above, it is considered that the land at The Elms should be removed from the Green Belt in order to facilitate its redevelopment for uses that would be more compatible with its location adjacent to existing areas of housing to the east of Harlington High Street.

The Local Plan process provides an ideal opportunity for the potential of this site to be recognised and for the current Green Belt designation to be removed in order to facilitate development. Whilst the Local Plan Part 1 does not make provision for any new housing allocations in Harlington, it is clear that the village benefits from existing infrastructure which would enable it to accommodate either new housing, new commercial development or a mix of both which would enhance the role of Harlington and improve the environment and amenity value of the area for the benefit of existing and prospective residents.

Whilst the housing land supply situation in the London Borough of Hillingdon is such that the Council appears able to meet its housing targets in the short-to-medium term, the Local Plan represents an opportunity to plan strategically for longer-term growth and to make provision for land that may be needed to provide for development needs arising as a result of continued growth in the demand for housing throughout the Borough. The absence of any housing allocations in Harlington where these would be well-related to the anticipated growth in jobs, appears to be contrary to the objectives of the Part 1 Local Plan and the principles of sustainable development more generally. In terms of the settlement itself, it is evident that it is currently highly-constrained by the Green Belt and as such the opportunities to accommodate even modest growth to meet local needs is unnecessarily curtailed.

The more general requirement to significantly boost the housing supply nationally, and more specifically in London and the South East, along with the environmental constraints present elsewhere in the Green Belt are all firm indications that the Council should allocate land which can accommodate a higher level of housing than planned for in the Part 1 – Local Plan.

Given that the site at The Elms represents previously developed land immediately adjoining an existing settlement and without any environmental constraints other than the current Green Belt designation, it is considered that its exclusion from the Green Belt to facilitate development would be entirely appropriate and indeed beneficial in light of its existing use and physical condition. In terms of its potential contribution towards the supply of housing in Hillingdon and elsewhere within the wider housing market area, and unlike many of the larger-scale development opportunities elsewhere in the Borough, the site at The Elms would be available for development now, is a suitable location for development and is realistically achievable within the next five years (as required by Foot Note 11 of the NPPF).

I hope the above and the enclosed are clear. If you have any further queries, please do not hesitate to contact me. I look forward to hearing from you.

Yours faithfully



Jim Bailey BA (Hons) MRTPI
Director

Encs.


APPENDIX 1: Extent of the land at The Elms



APPENDIX 2: Extract from Green Belt Assessment (September 2013) showing the current extent of the Green Belt boundaries.



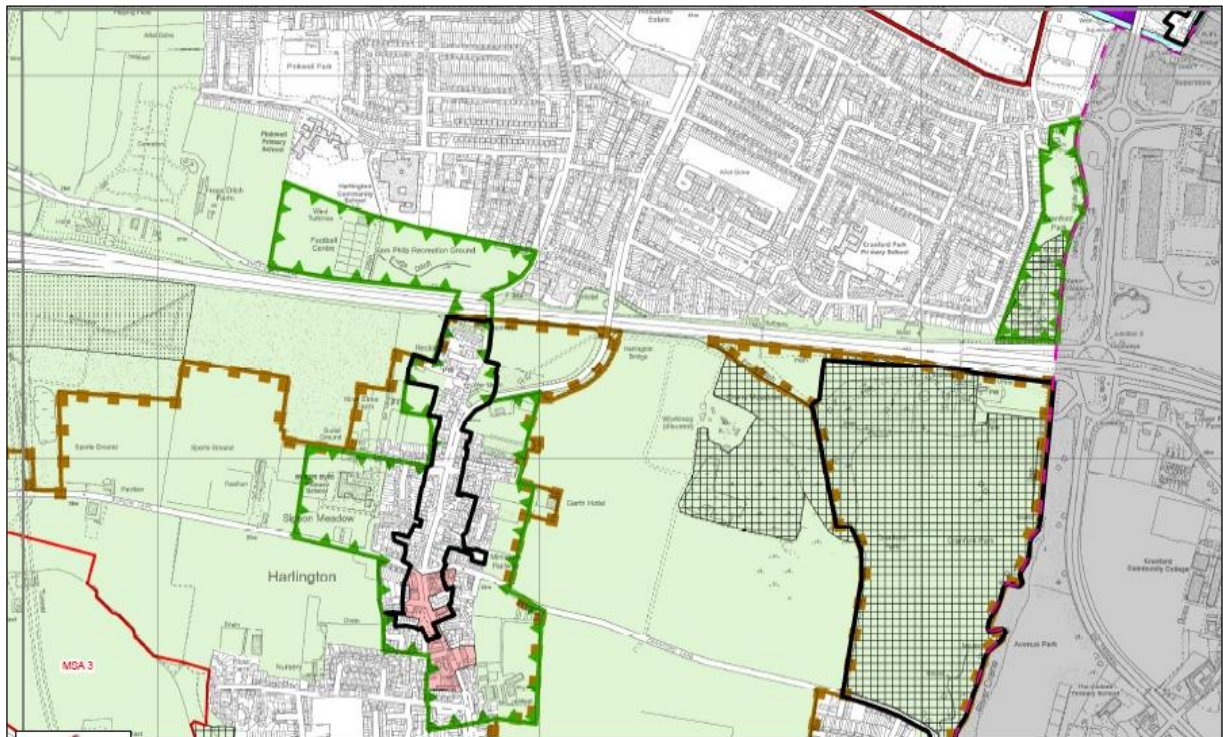
Map 39 – Palmer's Farm, 371 High Street, Harlington

LEGEND	
Existing Green Belt 	
Green Belt Assessment	
1) To check the unrestricted sprawl of large built-up areas;	×
2) To prevent neighbouring towns from merging into one another;	×
3) To assist in safeguarding the countryside from encroachment;	×
4) To preserve the setting and special character of historic towns;	×
5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	✓
Recommendation:	
<ul style="list-style-type: none"> • Retain Current Green Belt Designation 	
<p>Reason for Recommendation: This site meets at least one purpose of including land in the Green Belt as identified by the NPPF. There are other alternative sites available which would encourage the recycling of other derelict or urban land. The site therefore merits its current Green Belt designation.</p>	

APPENDIX 3: Proposed Revision of Green Belt Boundaries



APPENDIX 4: Harlington Policies Map (Atlas of Changes) showing the extent of Archaeological Priority Area (green) and Archaeological Priority Zone (brown)



Development **Transport Planning**

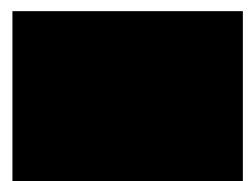
**THE ELMS ESTATE HARLINGTON LLP
THE ELMS, HIGH STREET, HARLINGTON**

**Submission to L B Hillingdon
In Response to Consultation on the
Local Plan Part 2
Site Allocations and Designations Document**

Transport Matters

Project No. 64061

November 2014



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APPENDICES

- Appendix A – Local Public Transport Information
- Appendix B – Site Plan and Existing Uses
- Appendix C – TRICS Data for Veterinary Hospitals
- Appendix D – Estimated Traffic Flows
- Appendix E – TRICS Data for Private Houses

DRAWINGS

- Drawing Number 64061-TS-001 – Site Location

DOCUMENT CONTROL SHEET

Issue	Date	Description	Author	Checked
1	30/10/2014	Draft for Comment	AKJ	AKJ
2	31/10/2014	Submission	AKJ	AKJ
3	03/11/2014	Minor Amendments	AKJ	AKJ

1.0 INTRODUCTION

1.1 The Elms Estate Harlington LLP is promoting land at The Elms, High Street, Harlington as a site suitable for residential development through the Hillingdon Local Plan process and in response to the public consultation on the Site Allocations and Designations document. The submission includes an existing residential house and its associated land to the north of The Elms Estate.

1.2 The Elms is currently occupied by a mix of commercial uses in a group of buildings of varying quality and construction. These include retail, office, industrial and storage uses with access onto High Street, Harlington and Cranford Lane.

1.3 This report contains:

- A description of the site location.
- a review of the local highway network and public transport services;
- an appraisal of existing site traffic flows;
- a summary and conclusion

2.0 SITE LOCATION AND LOCAL TRANSPORT NETWORKS

2.1 The Elms complex is a mixed use commercial development occupied by several small businesses in a number of buildings of different sizes and construction. It is located to the east of High Street to the north of its junction with West End Lane in the centre of Harlington village. An existing residential house to the north of The Elms is included in the site being promoted for allocation and together these have an area of about 1 hectare. The site location is shown in drawing number 64061-TS-001.

2.2 The main access to the site is to High Street via the service road to numbers 373 to 385 High Street which are residential dwellings. The service road connects to High Street to the north and south of the West End Lane junction and provides parking for residents as part of CPZ Zone H1. This CPZ is in operation between 9am and 5pm Monday to Saturday and the parking in the service road also allows parking by non-residents for up to 2 hours.

2.3 A secondary access is available from Cranford Lane which is to the north of the site and runs west to east from its junction with High Street and Sipson Lane. This access is used by heavy goods vehicles which are restricted from using the High Street access.

2.4 High Street runs north to south from its junction with A4 Bath Road and is a single carriageway road subject to a 30mph speed limit with parking restrictions, pedestrian crossings and bus stops. The frontage development is mostly residential dwellings, often with access from parallel service roads, with some retail and service uses.

Public Transport

2.5 There are bus stops located within 100m of the site in both directions and these are served by routes H98, 90 and 140. A further 6 routes, numbers 81, 105, 111, 222, 285 and 423 are located within 500m on Bath Road. Details of these services are attached at Appendix A. The site has a good level of public transport accessibility with a PTAL rating of 4.

2.6 London Underground services are available at Hatton Cross station which can be reached using bus routes 90 and 140. National Rail services call at Hayes and Harlington station which can be reached using bus routes 90, 140 and H98.

Cycling and Walking

2.7 High Street, Harlington, north of Cranford Lane is an advisory cycling route extending to Hayes town centre and connecting to the strategic on road cycle route network. Bath Road is part of the strategic cycle route network and has off-road cycle lanes which use the shared footways on both sides.

2.8 There is good footway provision locally to the site and a signalled pedestrian crossing is located nearby to the north of the site.

Local Facilities

2.9 A section of Harlington High Street between the junctions with West End Lane and Sipson Lane/Cranford Lane is designated as a Local Centre. The centre extends to about 350m from the site and provides a range of local shops and services including convenience stores, pharmacy, hairdressers, pubs and restaurants/take away. The nearest GP practice is the Glendale Medical Centre on High Street about 600m to the north.

2.10 The nearest primary school is William Byrd which is located about 850m walk from the site at Victoria Lane. The nearest secondary school is Harlington School at Pinkwell Lane about 2.0kms to the north. Bus routes 90, 140 and H98 run to Station Road about 700m from the school.

2.11 The largest source of employment nearby is at Heathrow Airport and the surrounding area which provides a very wide range of types of jobs. There are other major employment areas in Hayes and at Stockley Park which are accessible by public transport as well as by car.

2.12 The site is well located to a range of local shops, school and other services with a good level of public transport

3.0 EXISTING SITE LAND USES AND TRAFFIC FLOWS

3.1 The Elms complex was originally in agricultural use which has evolved to its existing form which comprises a variety of buildings which are occupied by a mix of commercial businesses. The main access to the site is from High Street Harlington via a footway crossover from a service road and passes through a parking court which serves the neighbouring residential properties. This access is currently restricted to a width of 3.5m using removal bollards and this restriction was installed to prevent its use by large delivery vehicles. Such vehicles must use Cranford Lane to access the site from the north.

3.2 The width of the main access is suitable for single lane operation and on occasions when two cars or vans meet there is sufficient space either side of the width restriction for a vehicle to wait to allow the other to pass. Visibility through the access for drivers is good and allows drivers to be aware of another vehicle in good time as they approach the access.

3.3 A plan of the existing site and a schedule of the buildings and their current land uses are attached at Appendix B. The existing uses of the site have been confirmed for the majority of the existing units through a series of planning applications and reference numbers of these are also set out at Appendix B. Each of those applications has been supported by a Transport Statement which assessed the level of vehicular movement associated with its use.

3.4 There are three units on the site that have not been subject to recent planning applications. Units 3 and 5 are currently in use as a veterinary hospital staffed with 1 Veterinary Surgeon. The trips associated with these units have been derived using data from TRICS for vets and using a trip rate based on the number of surgeons. This data is attached at Appendix C.

3.5 Unit 6 is currently vacant and was previously occupied by the business now in Unit 2A. The Transport Statement for the planning application for Unit 2A assumed that the vehicle movements associated with the business would not change and the same flows have been applied to these two units.

3.6 The estimated traffic movements associated with the whole of the existing site are set out in Appendix D. This shows that the daily traffic flows are of the order of 200 per day two-way. Peak hour flows are around 18 vph two-way.

4.0 POTENTIAL RESIDENTIAL USE

4.1 The Elms Estate Harlington LLP is promoting the site for residential use as part of the Local Plan Site Allocations and Designation process. The type and number of dwellings for any possible future development is yet to be determined and will be subject to further consideration as part of any future planning application.

4.2 However it is possible to provide an indication of the potential scale of a development by comparing the existing traffic flows associated with the site with those that might be generated by new residential development of different types and tenures.

4.3 For the purpose of this report, the TRICS database has been used to derive trip generation rates for privately owned houses and privately owned flats in Greater London. That data is attached at Appendix E.

4.4 The use of this data is intended to provide an indication of the scale of equivalent residential development and not necessarily the type and/or tenure of the dwellings that might be proposed. This category of housing can be expected to generate more trips than flats or affordable dwellings. The calculation of the number of equivalent dwellings using these trip rates is therefore a minimum and the potential development of the site could provide a greater number of homes.

4.5 The TRICS data for Privately Owned houses gives trip generation rates of about 6.4 two-way vehicle trips per dwelling per day and about 10% of this in the peak hours. That would indicate that the site could deliver a development of about 30 houses with an equivalent level of traffic flow to the existing uses on the site. This is consistent with a density of about 30 dwellings per hectare.

4.6 A development of this scale would have no material impact on the operation of the local highway network given that the traffic flows associated with it are equivalent to that associated with the existing uses. Whilst the existing access is and would be suitable to serve this level of traffic activity, the access layout could be remodelled to provide an access more suited to residential use.

5.0 SUMMARY AND CONCLUSIONS

5.1 The Elms Estate Harlington LLP is promoting land at The Elms, High Street, Harlington for residential development as part of the Hillingdon Local Plan process. The site is currently occupied by a number of buildings which are occupied by a variety of small businesses.

5.2 The permitted land uses include A1, B1, B2, B8 and Sui Generis and these have been confirmed by recent planning applications. Assessments of the numbers of vehicle trips associated with the existing uses have been set out in Transport Statements which indicates an existing daily two-way traffic movement of about 200 vehicles per day.

5.3 The site has access to High Street Harlington just north of West End Lane and at the southern end of the Harlington Local Centre. The centre provides a range of local shops and services and there is primary and secondary schools nearby. The site has a good level of public transport with 3 bus routes along High Street and a further 6 routes within walking distance on Bath Road.

5.4 An assessment of the potential for residential use indicates that a development of around 30 houses would generate an equivalent amount of traffic to the site. The potential residential use of the site would have no material traffic impact on the local highway network.

APPENDICES

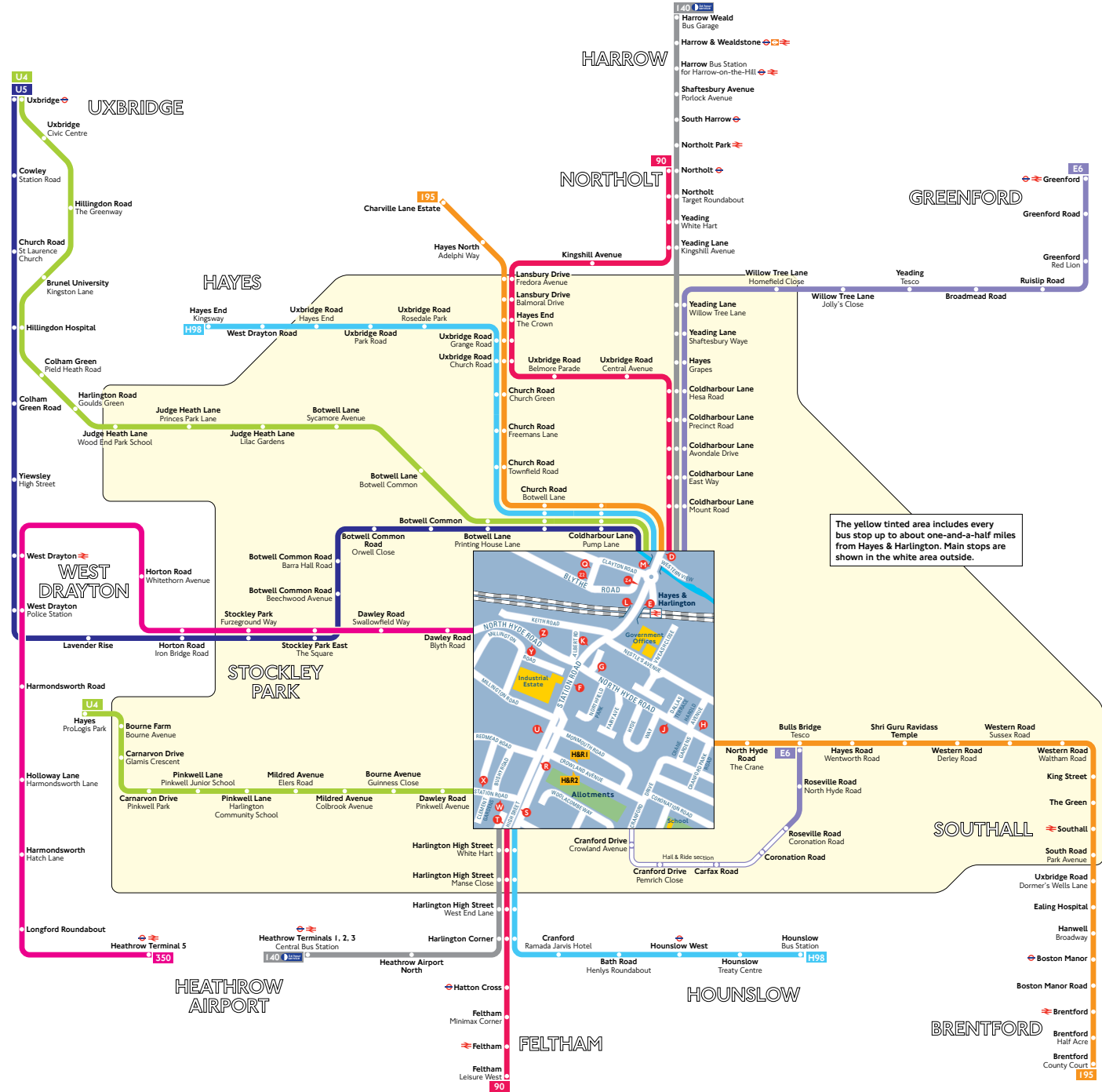
APPENDIX A

Buses from Hayes & Harlington

Route finder

Day buses including 24-hour services

Bus route	Towards	Bus stops
90	Feltham Northolt	F E R S K L M T U
140 <small>24-hour service</small>	Harrow Weald Heathrow Terminals 1,2,3	K L M T U F E R S
195	Brentford Charville Lane Estate	B G H J K L M
350	Heathrow Terminal 5	B C V
E6	Bulls Bridge Greenford	B F H&R I K L M U H&R 2
H98	Hayes End Hounslow	K L M T U F E R S
U4	Hayes ProLogis Park Uxbridge	F E R W K L M U X
U5	Uxbridge	K L M



The Elms, High Street, Harlington

Local Bus Services

Bus Services from High Street Bus Stops

Service No.	Route	Daytime Frequency
90	Feltham to Northolt Via Hatton Cross-Harlington-Hayes-Wood End	Mon to Sat (every 10 mins) Sun (every 20 mins)
140	Harrow Weald to Heathrow Airport (Terminals 1-3) Via Wealdstone-Harrow-West Harrow-South Harrow- Northolt – Yeading – Hayes - Harlington	Mon to Sat (every 8 mins) Sun (every 10 mins)
H98	Hayes End to Hounslow Via Wood End-Hayes-Harlington	Mon to Sat (every 8 mins) Sun (every 15 mins)

Bus Services from Bath Road Bus Stops

Service No.	Route	Daytime Frequency
81	Slough to Hounslow Via Langley-Colnbrook-Longford-Cranford	Mon to Sat (every 12 mins) Sun (every 15 mins)
105	Greenford to Heathrow Airport (Terminals 1-3) Via London (Somerset Road)-Southall-Cranford	Mon to Sat (every 12 mins) Sun (every 15 mins)
111	Heathrow Airport (Terminals 1-3) to Kingston Upon Thames Via Cranford-Heston	Mon to Sat (every 10 mins) Sun (every 12 mins)
140	Harrow Weald to Heathrow Airport (Terminals 1-3) Via Wealdstone-Harrow-West Harrow-South Harrow- Northolt – Yeading – Hayes - Harlington	Mon to Sat (every 8 mins) (24 Hour Service) Sun (every 10 mins)
285	Heathrow Airport (Terminals 1-3) to Kingston Upon Thames	Mon to Sat (every 10 mins) Sun (every 12 mins)
423	Heathrow Airport (Terminal 5) to Hounslow Via Longford-Hatton Cross	Mon to Sat (every 20 mins) Sun (every 30 mins)
N9	Heathrow Airport (Terminal 5) to Aldwych Via Hounslow-Isleworth- Brentford- Turnham Green – Hammersmith – Kensington – London (Green Park)	Evenings only, Mon to Sun (every 20 mins)

PTAI Study Report File Summary

PTAI Run Parameters

PTAI Run 20142710092238
Description 20142710092238
Run by user PTAL web application
Date and time 27/10/2014 09:22

Walk File Parameters

Walk File PLSQLTest
Day of Week M-F
Time Period AM Peak
Walk Speed 4.8 kph
BUS Walk Access Time (mins) 8
BUS Reliability Factor 2.0
LU LRT Walk Access Time (mins) 12
LU LRT Reliability Factor 0.75
NATIONAL_RAIL Walk Access Time (mins) 12
NATIONAL_RAIL Reliability Factor 0.75

Coordinates: 508816, 177384

Mode	Stop	Route	Distance (metres)	Frequency (vph)	Weight	Walk time (mins)	SWT (mins)	TAT (mins)	EDF	AI
BUS	HARLINGTON WEST END LANE	H98	72.18	7.5	0.5	0.9	6.0	6.9	4.35	2.17
BUS	HARLINGTON WEST END LANE	140	72.18	8.0	1.0	0.9	5.75	6.65	4.51	4.51

BUS	HARLINGTON WEST END LANE	90	72.18	6.0	0.5	0.9	7.0	7.9	3.8	1.9
BUS	HARLINGTON CORNER	285	486.85	6.0	0.5	6.09	7.0	13.09	2.29	1.15
BUS	HARLINGTON CORNER	105	486.85	6.0	0.5	6.09	7.0	13.09	2.29	1.15
BUS	HARLINGTON CORNER	222	486.85	8.0	0.5	6.09	5.75	11.84	2.53	1.27
BUS	HARLINGTON CORNER	111	486.85	7.0	0.5	6.09	6.29	12.37	2.42	1.21
BUS	HARLINGTON CORNER	423	486.85	3.0	0.5	6.09	12.0	18.09	1.66	0.83
BUS	HARLINGTON CORNER	81	486.85	5.0	0.5	6.09	8.0	14.09	2.13	1.06

LT SAP Points Not Found

NR SAP Points Not Found

Total AI for this POI is 15.25.

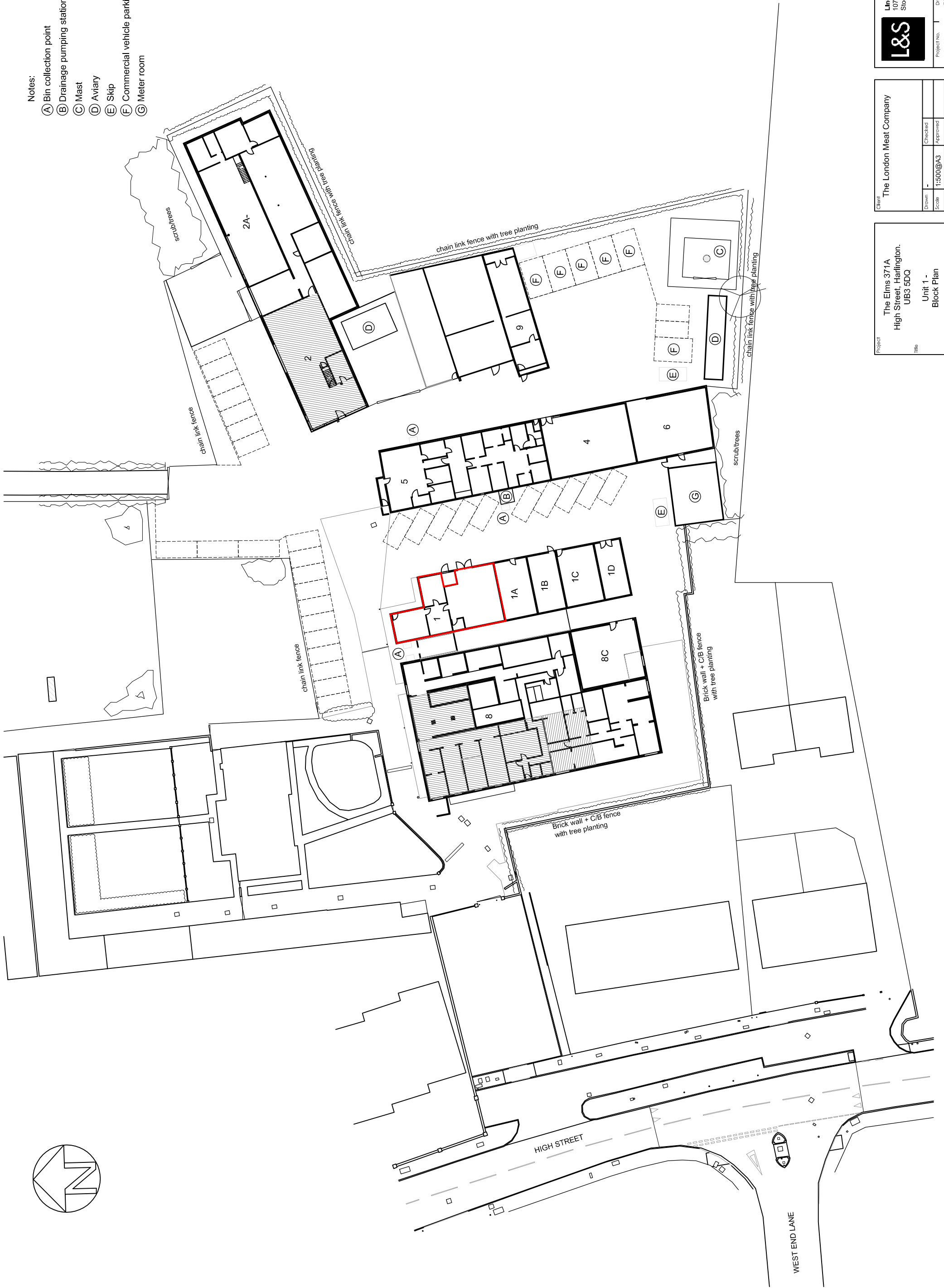
PTAL Rating is 4.

APPENDIX B



Notes:

- (A) Bin collection point
- (B) Drainage pumping station
- (C) Mast
- (D) Aviary
- (E) Skip
- (F) Commercial vehicle parking
- (G) Meter room



Project
 The Elms 371A
 High Street, Harlington,
 UB3 5DQ
 Title
 Unit 1 -
 Block Plan

Client
 The London Meat Company

Drawn	1:500@A3	Checked	
Scale		Approved	
		Copyright reserved	

L&S
 Lines & Squares Ltd
 107 Lansdowne Rd
 Stockwell SW6 2PB

Project No.
 LS168

Drawing No.
 PL1/2

Sheet
 C

Existing Uses

UNIT	Planning Application Reference	Current Use	GFA m ²	Notes	Use Class
1	19758/APP/2014/823	Derwent Building Services Limited	109	57m ² office, 52m ² storage	B1, B2
1A	19758/APP/2014/835	Pet Grooming	39		A1
1B	19758/APP/2014/834	Sandwich Preparation	34		B1c
1C	19758/APP/2014/833	Storage	46		B1a/B8
2	19758/APP/2014/831	Pet Shop	156	Pet Shop with Office	A1
2A	19758/APP/2014/838	Packaging Operations	212	Industrial	B2
3 and 5		Animal Health Centre - Vet	265		Sui Generis
4	19758/APP/2014/828	Upholsterers	110		B2
6		Vacant	100?		
8	19758/APP/2014/791	Meat and Poultry Production and Packaging	614	A1 10m ² / B2 604 m ²	B2
9	19758/APP/2014/826	HFC couriers	77		B8
10		Vacant			

Unit 1: Change of use of Unit 1 to mixed use, including offices (Class B1a) and storage & distribution (Class B8)

Unit 1A: Change of use to dog grooming (Class sui generis)

Unit 1B: Change of use to food preparation with no retail or sales element (Class B1c)

Unit 1C: Change of use of premises offices (Class B1a) and/or storage & distribution (Class B8)

Unit 2: Change of use of premises from to retail (Class A1) and ancillary storage (Class B8)

Unit 2A: Change of use of vacant, former agricultural building to use for packaging, storage and pallet manufacture (Class B2- General Industrial)

Unit 4: Change of use of premises from storage and packaging of materials (Class B2/B8), to light industrial (Class B1c), and ancillary storage (Class B8)

Unit 8: Change of use of existing building to meat cutting, packing and distribution (Class B2)

Unit 9: Change of use of Unit 9 to storage and distribution (Class B8)

APPENDIX C

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 05 - HEALTH
 Category : M - VETERINARY SURGERY
 VEHICLES

Selected regions and areas:

03	SOUTH WEST	
	GS GLOUCESTERSHIRE	1 days
04	EAST ANGLIA	
	CA CAMBRIDGESHIRE	1 days
15	GREATER DUBLIN	
	DL DUBLIN	1 days

Filtering Stage 2 selection:

Parameter: Number of surgeons
 Actual Range: 1 to 6 (units:)
 Range Selected by User: 1 to 6 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/06 to 12/07/13

Selected survey days:

Wednesday	2 days
Friday	1 days

Selected survey types:

Manual count	3 days
Directional ATC Count	0 days

Selected Locations:

Suburban Area (PPS6 Out of Centre)	2
Edge of Town	1

Selected Location Sub Categories:

Residential Zone	2
No Sub Category	1

Filtering Stage 3 selection:

Use Class:

D1	3 days
----	--------

Population within 1 mile:

5,001 to 10,000	1 days
15,001 to 20,000	1 days
25,001 to 50,000	1 days

Population within 5 miles:

100,001 to 125,000	1 days
125,001 to 250,000	1 days
500,001 or More	1 days

Car ownership within 5 miles:

0.6 to 1.0	1 days
1.1 to 1.5	2 days

DTPL Kingswick Drive Sunninghill

Licence No: 743701

Filtering Stage 3 selection (Cont.):

Travel Plan:

No

3 days

LIST OF SITES relevant to selection parameters

1	CA-05-M-01	VETERINARY SURGERY		CAMBRIDGESHIRE
		CHERRY HINTON ROAD		
		CAMBRIDGE		
		Suburban Area (PPS6 Out of Centre)		
		Residential Zone		
		Total Number of surgeons:	6	
		Survey date: FRIDAY	12/07/13	Survey Type: MANUAL
2	DL-05-M-01	VET HOSPITAL		DUBLIN
		MALAHIDE ROAD		
		MARINO		
		DUBLIN		
		Suburban Area (PPS6 Out of Centre)		
		No Sub Category		
		Total Number of surgeons:	2	
		Survey date: WEDNESDAY	21/04/10	Survey Type: MANUAL
3	GS-05-M-01	ANIMAL HOSPITAL		GLOUCESTERSHIRE
		THE REDDINGS		
		UP HATHERLEY		
		CHELTENHAM		
		Edge of Town		
		Residential Zone		
		Total Number of surgeons:	1	
		Survey date: WEDNESDAY	28/04/10	Survey Type: MANUAL

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY
VEHICLES

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	3	0.889	3	3	0.111	3	3	1.000
08:00 - 09:00	3	3	1.556	3	3	0.444	3	3	2.000
09:00 - 10:00	3	3	1.667	3	3	1.556	3	3	3.223
10:00 - 11:00	3	3	0.889	3	3	1.333	3	3	2.222
11:00 - 12:00	3	3	1.333	3	3	1.111	3	3	2.444
12:00 - 13:00	3	3	1.000	3	3	1.222	3	3	2.222
13:00 - 14:00	3	3	1.111	3	3	0.778	3	3	1.889
14:00 - 15:00	3	3	1.556	3	3	2.000	3	3	3.556
15:00 - 16:00	3	3	1.333	3	3	2.000	3	3	3.333
16:00 - 17:00	3	3	2.556	3	3	2.000	3	3	4.556
17:00 - 18:00	3	3	1.556	3	3	1.889	3	3	3.445
18:00 - 19:00	3	3	1.778	3	3	1.889	3	3	3.667
19:00 - 20:00	2	4	0.125	2	4	0.625	2	4	0.750
20:00 - 21:00	1	2	0.000	1	2	1.000	1	2	1.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			17.349			17.958			35.307

Parameter summary

Trip rate parameter range selected: 1 - 6 (units:)
 Survey date date range: 01/01/06 - 12/07/13
 Number of weekdays (Monday-Friday): 3
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY
TAXIS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	3	0.000	3	3	0.000	3	3	0.000
08:00 - 09:00	3	3	0.000	3	3	0.000	3	3	0.000
09:00 - 10:00	3	3	0.000	3	3	0.000	3	3	0.000
10:00 - 11:00	3	3	0.000	3	3	0.000	3	3	0.000
11:00 - 12:00	3	3	0.000	3	3	0.000	3	3	0.000
12:00 - 13:00	3	3	0.000	3	3	0.000	3	3	0.000
13:00 - 14:00	3	3	0.000	3	3	0.000	3	3	0.000
14:00 - 15:00	3	3	0.000	3	3	0.000	3	3	0.000
15:00 - 16:00	3	3	0.000	3	3	0.000	3	3	0.000
16:00 - 17:00	3	3	0.000	3	3	0.000	3	3	0.000
17:00 - 18:00	3	3	0.000	3	3	0.000	3	3	0.000
18:00 - 19:00	3	3	0.000	3	3	0.000	3	3	0.000
19:00 - 20:00	2	4	0.000	2	4	0.000	2	4	0.000
20:00 - 21:00	1	2	0.000	1	2	0.000	1	2	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

Parameter summary

Trip rate parameter range selected: 1 - 6 (units:)
 Survey date date range: 01/01/06 - 12/07/13
 Number of weekdays (Monday-Friday): 3
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY
OGVS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	3	0.000	3	3	0.000	3	3	0.000
08:00 - 09:00	3	3	0.000	3	3	0.000	3	3	0.000
09:00 - 10:00	3	3	0.111	3	3	0.111	3	3	0.222
10:00 - 11:00	3	3	0.000	3	3	0.000	3	3	0.000
11:00 - 12:00	3	3	0.000	3	3	0.000	3	3	0.000
12:00 - 13:00	3	3	0.111	3	3	0.111	3	3	0.222
13:00 - 14:00	3	3	0.000	3	3	0.000	3	3	0.000
14:00 - 15:00	3	3	0.000	3	3	0.000	3	3	0.000
15:00 - 16:00	3	3	0.000	3	3	0.000	3	3	0.000
16:00 - 17:00	3	3	0.000	3	3	0.000	3	3	0.000
17:00 - 18:00	3	3	0.000	3	3	0.000	3	3	0.000
18:00 - 19:00	3	3	0.000	3	3	0.000	3	3	0.000
19:00 - 20:00	2	4	0.000	2	4	0.000	2	4	0.000
20:00 - 21:00	1	2	0.000	1	2	0.000	1	2	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.222			0.222			0.444

Parameter summary

Trip rate parameter range selected: 1 - 6 (units:)
 Survey date date range: 01/01/06 - 12/07/13
 Number of weekdays (Monday-Friday): 3
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY

PSVS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	3	0.000	3	3	0.000	3	3	0.000
08:00 - 09:00	3	3	0.000	3	3	0.000	3	3	0.000
09:00 - 10:00	3	3	0.000	3	3	0.000	3	3	0.000
10:00 - 11:00	3	3	0.000	3	3	0.000	3	3	0.000
11:00 - 12:00	3	3	0.000	3	3	0.000	3	3	0.000
12:00 - 13:00	3	3	0.000	3	3	0.000	3	3	0.000
13:00 - 14:00	3	3	0.000	3	3	0.000	3	3	0.000
14:00 - 15:00	3	3	0.000	3	3	0.000	3	3	0.000
15:00 - 16:00	3	3	0.000	3	3	0.000	3	3	0.000
16:00 - 17:00	3	3	0.000	3	3	0.000	3	3	0.000
17:00 - 18:00	3	3	0.000	3	3	0.000	3	3	0.000
18:00 - 19:00	3	3	0.000	3	3	0.000	3	3	0.000
19:00 - 20:00	2	4	0.000	2	4	0.000	2	4	0.000
20:00 - 21:00	1	2	0.000	1	2	0.000	1	2	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.000			0.000			0.000

Parameter summary

Trip rate parameter range selected: 1 - 6 (units:)
 Survey date date range: 01/01/06 - 12/07/13
 Number of weekdays (Monday-Friday): 3
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY
CYCLISTS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	3	3	0.000	3	3	0.000	3	3	0.000
08:00 - 09:00	3	3	0.111	3	3	0.000	3	3	0.111
09:00 - 10:00	3	3	0.222	3	3	0.222	3	3	0.444
10:00 - 11:00	3	3	0.111	3	3	0.111	3	3	0.222
11:00 - 12:00	3	3	0.111	3	3	0.111	3	3	0.222
12:00 - 13:00	3	3	0.000	3	3	0.111	3	3	0.111
13:00 - 14:00	3	3	0.111	3	3	0.000	3	3	0.111
14:00 - 15:00	3	3	0.111	3	3	0.000	3	3	0.111
15:00 - 16:00	3	3	0.000	3	3	0.111	3	3	0.111
16:00 - 17:00	3	3	0.111	3	3	0.000	3	3	0.111
17:00 - 18:00	3	3	0.111	3	3	0.222	3	3	0.333
18:00 - 19:00	3	3	0.000	3	3	0.111	3	3	0.111
19:00 - 20:00	2	4	0.000	2	4	0.000	2	4	0.000
20:00 - 21:00	1	2	0.000	1	2	0.000	1	2	0.000
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.999			0.999			1.998

Parameter summary

Trip rate parameter range selected: 1 - 6 (units:)
 Survey date date range: 01/01/06 - 12/07/13
 Number of weekdays (Monday-Friday): 3
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

APPENDIX D

Existing Uses

Estimated Traffic Flows

Drawing Number	UNIT	Planning Application Reference	Current Use	GFA m ²	Peak Hours	Daily
PL1-03B	1	19758/APP/2014/823	Derwent Building Services Limited	109	2	8
PL1A-03B	1A	19758/APP/2014/835	Pet Grooming	39	0	10
PL1B-03B	1B	19758/APP/2014/834	Sandwich Preparation	34	0	10
PL1C-03B	1C	19758/APP/2014/833	Storage	46	1.5	8
PL2-3D	2	19758/APP/2014/831	Pet Shop	156	7	54
PL2A-3B	2A	19758/APP/2014/838	Packaging Operations	212	1	6
	3 and 5		Animal Health Centre - Vet	265	2	35
PL04-3B	4	19758/APP/2014/828	Upholsterers	110	1.5	8
	6		Vacant	100?	1	6
PL8-03C	8	19758/APP/2014/791	Meat and Poultry Production and Packaging	614	0	30
PL9-3B	9	19758/APP/2014/826	HFC couriers	77	2	24
Totals					18	199

APPENDIX E

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
 Category : A - HOUSES PRIVATELY OWNED
 VEHICLES

Selected regions and areas:

01	GREATER LONDON	
BT	BRENT	1 days
KI	KINGSTON	2 days
KN	KENSINGTON AND CHELSEA	1 days
SK	SOUTHWARK	1 days
WE	WESTMINSTER	1 days
WF	WALTHAM FOREST	1 days

Filtering Stage 2 selection:

Parameter: Number of dwellings
 Actual Range: 12 to 82 (units:)
 Range Selected by User: 10 to 100 (units:)

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/06 to 24/06/10

Selected survey days:

Tuesday	2 days
Thursday	4 days
Friday	1 days

Selected survey types:

Manual count	7 days
Directional ATC Count	0 days

Selected Locations:

Edge of Town Centre	1
Suburban Area (PPS6 Out of Centre)	6

Selected Location Sub Categories:

Residential Zone	5
Built-Up Zone	2

Filtering Stage 3 selection:

Use Class:

C3	7 days
----	--------

Population within 1 mile:

25,001 to 50,000	3 days
50,001 to 100,000	3 days
101,000 or More	1 days

Population within 5 miles:

500,001 or More	7 days
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Car ownership within 5 miles:

0.5 or Less	3 days
0.6 to 1.0	2 days
1.1 to 1.5	2 days

DTPL Kingswick Drive Sunninghill

Licence No: 743701

Filtering Stage 3 selection (Cont.):

Travel Plan:

No

7 days

LIST OF SITES relevant to selection parameters

1	BT-03-A-01 KENTON ROAD	SEMI DETACHED		BRENT
	BRENT Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 82 Survey date: TUESDAY 20/11/07			
2	KI-03-A-01 COOMBE RISE	DETACHED		Survey Type: MANUAL KINGSTON
	KINGSTON UPON THAMES Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 12 Survey date: THURSDAY 24/06/10			
3	KI-03-A-02 WOLSEY CLOSE	DETACHED		Survey Type: MANUAL KINGSTON
	KINGSTON UPON THAMES Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 20 Survey date: THURSDAY 24/06/10			
4	KN-03-A-01 BARLBY ROAD	TERRACED		Survey Type: MANUAL KENSINGTON AND CHELSEA
	NORTH KENSINGTON Suburban Area (PPS6 Out of Centre) Built-Up Zone Total Number of dwellings: 24 Survey date: FRIDAY 26/01/07			
5	SK-03-A-01 TIMBER POND ROAD	SEMI DET. & TERRACED		Survey Type: MANUAL SOUTHWARK
	CANADA WATER Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 15 Survey date: THURSDAY 23/10/08			
6	WE-03-A-01 HEREFORD ROAD	PRINCES MEWS		Survey Type: MANUAL WESTMINSTER
	NOTTING HILL Suburban Area (PPS6 Out of Centre) Residential Zone Total Number of dwellings: 18 Survey date: THURSDAY 15/10/09			
7	WF-03-A-01 CLEVELAND PARK AVENUE	TERRACED		Survey Type: MANUAL WALTHAM FOREST
	WALTHAMSTOW Edge of Town Centre Built-Up Zone Total Number of dwellings: 53 Survey date: TUESDAY 30/01/07			

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	32	0.125	7	32	0.277	7	32	0.402
08:00 - 09:00	7	32	0.272	7	32	0.348	7	32	0.620
09:00 - 10:00	7	32	0.250	7	32	0.205	7	32	0.455
10:00 - 11:00	7	32	0.223	7	32	0.205	7	32	0.428
11:00 - 12:00	7	32	0.290	7	32	0.277	7	32	0.567
12:00 - 13:00	7	32	0.250	7	32	0.304	7	32	0.554
13:00 - 14:00	7	32	0.241	7	32	0.183	7	32	0.424
14:00 - 15:00	7	32	0.290	7	32	0.272	7	32	0.562
15:00 - 16:00	7	32	0.304	7	32	0.299	7	32	0.603
16:00 - 17:00	7	32	0.326	7	32	0.339	7	32	0.665
17:00 - 18:00	7	32	0.326	7	32	0.272	7	32	0.598
18:00 - 19:00	7	32	0.250	7	32	0.254	7	32	0.504
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			3.147			3.235			6.382

Parameter summary

Trip rate parameter range selected: 12 - 82 (units:)
 Survey date date range: 01/01/06 - 24/06/10
 Number of weekdays (Monday-Friday): 7
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
TAXIS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	32	0.004	7	32	0.009	7	32	0.013
08:00 - 09:00	7	32	0.000	7	32	0.000	7	32	0.000
09:00 - 10:00	7	32	0.000	7	32	0.000	7	32	0.000
10:00 - 11:00	7	32	0.004	7	32	0.004	7	32	0.008
11:00 - 12:00	7	32	0.009	7	32	0.009	7	32	0.018
12:00 - 13:00	7	32	0.000	7	32	0.004	7	32	0.004
13:00 - 14:00	7	32	0.000	7	32	0.000	7	32	0.000
14:00 - 15:00	7	32	0.040	7	32	0.027	7	32	0.067
15:00 - 16:00	7	32	0.009	7	32	0.009	7	32	0.018
16:00 - 17:00	7	32	0.004	7	32	0.004	7	32	0.008
17:00 - 18:00	7	32	0.009	7	32	0.013	7	32	0.022
18:00 - 19:00	7	32	0.004	7	32	0.004	7	32	0.008
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.083			0.083			0.166

Parameter summary

Trip rate parameter range selected: 12 - 82 (units:)
 Survey date date range: 01/01/06 - 24/06/10
 Number of weekdays (Monday-Friday): 7
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
OGVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	32	0.000	7	32	0.000	7	32	0.000
08:00 - 09:00	7	32	0.000	7	32	0.000	7	32	0.000
09:00 - 10:00	7	32	0.009	7	32	0.013	7	32	0.022
10:00 - 11:00	7	32	0.004	7	32	0.009	7	32	0.013
11:00 - 12:00	7	32	0.022	7	32	0.009	7	32	0.031
12:00 - 13:00	7	32	0.004	7	32	0.004	7	32	0.008
13:00 - 14:00	7	32	0.000	7	32	0.000	7	32	0.000
14:00 - 15:00	7	32	0.004	7	32	0.004	7	32	0.008
15:00 - 16:00	7	32	0.000	7	32	0.004	7	32	0.004
16:00 - 17:00	7	32	0.000	7	32	0.000	7	32	0.000
17:00 - 18:00	7	32	0.000	7	32	0.000	7	32	0.000
18:00 - 19:00	7	32	0.004	7	32	0.000	7	32	0.004
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.047			0.043			0.090

Parameter summary

Trip rate parameter range selected: 12 - 82 (units:)
 Survey date date range: 01/01/06 - 24/06/10
 Number of weekdays (Monday-Friday): 7
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED

PSVS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	32	0.000	7	32	0.000	7	32	0.000
08:00 - 09:00	7	32	0.000	7	32	0.004	7	32	0.004
09:00 - 10:00	7	32	0.000	7	32	0.000	7	32	0.000
10:00 - 11:00	7	32	0.004	7	32	0.000	7	32	0.004
11:00 - 12:00	7	32	0.000	7	32	0.004	7	32	0.004
12:00 - 13:00	7	32	0.000	7	32	0.000	7	32	0.000
13:00 - 14:00	7	32	0.000	7	32	0.000	7	32	0.000
14:00 - 15:00	7	32	0.000	7	32	0.000	7	32	0.000
15:00 - 16:00	7	32	0.004	7	32	0.004	7	32	0.008
16:00 - 17:00	7	32	0.004	7	32	0.000	7	32	0.004
17:00 - 18:00	7	32	0.004	7	32	0.004	7	32	0.008
18:00 - 19:00	7	32	0.000	7	32	0.000	7	32	0.000
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.016			0.016			0.032

Parameter summary

Trip rate parameter range selected: 12 - 82 (units:)
 Survey date date range: 01/01/06 - 24/06/10
 Number of weekdays (Monday-Friday): 7
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DTPL Kingswick Drive Sunninghill

Licence No: 743701

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
CYCLISTS

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	7	32	0.000	7	32	0.004	7	32	0.004
08:00 - 09:00	7	32	0.000	7	32	0.004	7	32	0.004
09:00 - 10:00	7	32	0.004	7	32	0.013	7	32	0.017
10:00 - 11:00	7	32	0.009	7	32	0.004	7	32	0.013
11:00 - 12:00	7	32	0.013	7	32	0.004	7	32	0.017
12:00 - 13:00	7	32	0.000	7	32	0.000	7	32	0.000
13:00 - 14:00	7	32	0.000	7	32	0.000	7	32	0.000
14:00 - 15:00	7	32	0.000	7	32	0.004	7	32	0.004
15:00 - 16:00	7	32	0.000	7	32	0.004	7	32	0.004
16:00 - 17:00	7	32	0.000	7	32	0.000	7	32	0.000
17:00 - 18:00	7	32	0.000	7	32	0.000	7	32	0.000
18:00 - 19:00	7	32	0.013	7	32	0.004	7	32	0.017
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.039			0.041			0.080

Parameter summary

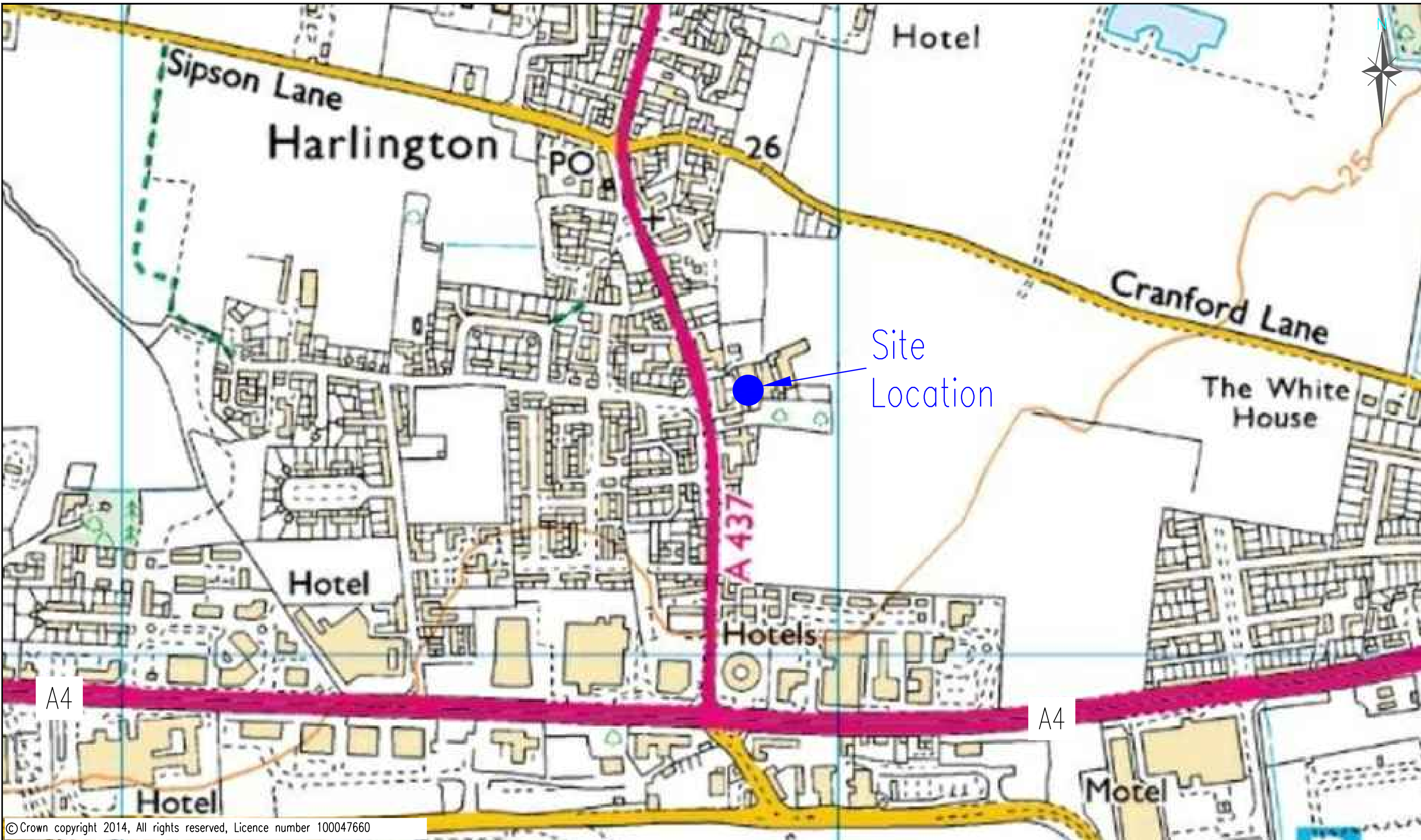
Trip rate parameter range selected: 12 - 82 (units:)
 Survey date date range: 01/01/06 - 24/06/10
 Number of weekdays (Monday-Friday): 7
 Number of Saturdays: 0
 Number of Sundays: 0
 Surveys manually removed from selection: 0

DRAWINGS


NOTE THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN DEVELOPMENT TRANSPORT PLANNING AND MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR WRITTEN CONSENT

CAD FILE NAME : R:\PROJECTS\64061 HIGH STREET, HARLINGTON\TECH\ACAD\DRAWINGS\64061-TS-001 SITE LOCATION PLAN.DWG

CTB FILE NAME : acad.ctb
PLOTTED DATE : 30-Oct-2014



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JOB TITLE High Street, Harlington							CLIENT The Elms Estate Harlington LLP	
DRAWING TITLE SITE LOCATION PLAN							Development Transport Planning 	
DESIGNED BY TMS DATE 30/10/14	DRAWN BY TMS DATE 30/10/14	CHECKED BY AKJ DATE 30/10/14	PASSED BY AKJ DATE 30/10/14	SCALES @ A3 SIZE 1:5,000	ISSUE STATUS PRELIMINARY	DRAWING NUMBER 64061-TS-001		
REV		DE	DR	CH	PA	DATE		



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address				2. Agent's Name and Address (if applicable)	
Title				Title	MR
First name				First name	JIM
Last Name				Last name	BAILEY
Organisation (if relevant)	THE ELMS ESTATE HARLINGTON LLP			Company	ALLIANCE PLANNING.
Unit		House number		Unit	
House name				House name	
Address 1				Address 1	
Address 2				Address 2	
Town				Town	
County				County	
Postcode				Postcode	
Telephone				Telephone	
Email				Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	NEW POLICY SA33
Paragraph Number; or	GREEN BELT DELETIONS.
Table or Figure Number; or	
Map Number (Atlas of Changes)	HARLINGTON

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input checked="" type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

PLEASE SEE ENCLOSED LETTER; OUR REF 5334

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

PLEASE SEE ENCLOSED LETTER : OUR REF 5334

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

THE ISSUES RAISED IN THE ENCLOSED REPRESENTATIONS (AS HIGHLIGHTED IN THE COVERING LETTER) SHOULD BE THE SUBJECT OF FURTHER REVIEW AND EXAMINATION BY AN INSPECTOR.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

N/A.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingsdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingsdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address	
Title	Mr
First name	Robin
Last Name	Brown
Organisation (if relevant)	Friends of Lake Farm; Hayes Community Development Forum
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

2. Agent's Name and Address (if applicable)		
Title		
First name		
Last name		
Company		
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

PART B - Your responses:

Please complete Part B for **each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2		Technical Reports (<i>answer Q1 & Q9 only</i>)	
<input checked="" type="checkbox"/>	Development Management Policies	<input checked="" type="checkbox"/>	Sustainability Appraisal pre-submission version
<input checked="" type="checkbox"/>	Site Allocations and Designations	<input type="checkbox"/>	Consultation statement
<input checked="" type="checkbox"/>	Policies Map (Atlas of Changes)	<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	Identified throughout representation
Paragraph Number; or	“ “ “
Table or Figure Number; or	“ “ “
Map Number (Atlas of Changes)	“ “ “

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

AIR QUALITY (AQ):

Part 1 Policy EM8 Land, Water, Air and Noise, on AQ had not expressed national planning policy (and now national guidance) to meet local circumstances and respond to the need to achieve sustainable development. (For example, NPPF para 124 & PPG AQ Section 2: policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants taking into account the presence of AQ Management Areas and cumulative impacts on AQ from individual sites /number of smaller developments). (See also Part 2's Sustainability Appraisal Section 6.7 Poor AQ, particularly paras 6.73 & 6.74's assessment that developments that are Air Quality Neutral (vide London Plan 2011 Policy 7.14 and Part 1 Policy EM8) would not advance the current extreme poor situation in many areas).

Part 2 Policy DMEI 18 AQ repeats Air Quality Neutral from the London Plan and then goes on to require demonstration of emission reduction to accord with EU values. Given the growing evidence of harm arising from air pollution, Part 2 Policy DMEI 18, even when read with Part 1 Policy EM8 is an inadequate local interpretation of national policy and guidance. And this is in a context of significant population growth, recent and predicted. AQ is a key sustainability issue – London's air is still polluted, the worst of any city in the UK. There is a present and immediate harm to the health and well-being of persons in the borough and an associated equalities issue arising from the adverse impact of pollution particularly concentrated on vulnerable populations in the south of the borough. Policies and proposals on AQ should be strengthened and other policies and proposals should contribute to the improvement of AQ and the tackling of air pollution.

Note that Part 2's **Sustainability Appraisal** Framework for Sustainability Objective "To improve AQ..." has a target: "Reversion of the AQMA". This does not have sufficient clarity of meaning.

Part 2 **Development Management** text para 6.57 suggests that there exists a SPD on Noise & AQ, whereas, currently, there are separate documents: SPG on AQ 2002 and SPD on Noise 2006.

Part 1 Policy EM8 promised an updated AQ SPD (from the monitoring section).

Part 1 text para 8.136 promised policies on use of biomass, particularly for AQMA, but these are not in Part 2.

Policy DMT 6 Vehicle Parking refers to Appendix A Table 1 whose a) Specific Requirements subsection 10 Parking for electric vehicles (current min. 5% with 5% passive provision) is not in conformity with London Plan 2011 – see Table 6.2 Car Parking Standards (at end of chapter 6): Parking for Employment Uses B1 has a note that 20% of all spaces must be for electric vehicles with an additional 10% passive provision... ; for Residential development, its note reads 20%... additional 20% passive provision.

NATURE CONSERVATION:

Local Plan Part 2 on nature conservation is not consistent with national policy and guidance and not in conformity with the London Plan 2011. This is notwithstanding the acknowledgement of the statutory duty on public authorities to conserve biodiversity in Part 2 para 6.22.

NPPF para 158 requires Local Plan based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. NPPF para 165 requires planning policies and decisions to be based on up-to-date information about the natural environment... . NPPF para 117: to minimize impacts on biodiversity... planning policies should... identify and map components of the local ecological networks, including the hierarchy of... sites of importance for biodiversity... promote priority habitats, ecological networks and protection/recovery of priority species populations etc.

Planning Guidance (PPG) Natural Environment: How should lpas set about planning for biodiversity and geodiversity: by, inter alia, seeking to work collaboratively with other partners... based on local priorities and evidence. For Local Ecological Networks, evidence and mapping them, this includes the location and extent of locally designated sites.

London Plan 2011 Policy 7.19 Biodiversity and Access to Nature section Fc states that boroughs should include policies and proposals for the protection of protected/priority species and habitats and the enhancement of their population and their extent via appropriate Biodiversity Action Plan (BAP) targets.

Part 1 Policy EM7 Biodiversity & geological Conservation promised to review all Borough Grade Sites of Interest for Nature Conservation (SINCs) and that this policy's Implementation would include collaborative working when reviewing the BAP. Nevertheless, not all SINCs and their revised areas and status have been brought forward in Part 2 at variance with the assertion within Part 2' Sustainability Appraisal para 9.7.1 that nature conservation et al designations stem from evidenced based studies, Again, the relevant Sustainability Objective "To ensure sustainable management and conservation of wildlife and habitats representative of the borough and reverse those in decline" cannot be adequately monitored by the indicators in Appendix 2 of the **Sustainability Appraisal Framework** as Hillingdon's BAP is not being progressed.

Part 1 Policy EM7 and Part 2 **Site Allocations & Designations SINCs** paras 5.11 to 5.18 explain that the evidence and process is based on 2005 GLA/LBH review. Para 5.17 promises to take forward the SINCs outlined in Ecology Handbook 8 together with the revisions and deletions recommended in the 2005 updated survey. These documents are not in the Local Plan Evidence Base. A request that the Review be put on the Council's website has to date not been actioned. However, it is in the public domain that the 2005 Review recommended the upgrading of most of Lake Farm Country Park to Borough Grade 1 status. Presently only a fraction, a small area extending from the Grand Union Canal Metropolitan/Borough Grade 1 SINC appears on the UDP Plan.

To corroborate this information, the publicly accessible part of the GIGL website (Greenspace Information for Greater London – the key depository for open space and biodiversity records in Greater London – www.gigl.org/online/) has been checked. This enables the various areas and designations for Wildlife sites to be viewed. Most of Lake Farm Country Park is shown as Borough Importance 1. Similarly, most of Cranford Park, south of the M4 is shown as Borough Importance 1, with parts adjoining the River Crane of Metropolitan significance plus an area north of the M4. These designations are at variance with Part 2's **Site Allocations & Designations, Atlas of Changes and Policies Map**.

Consequently, the Local Plan on nature conservation is being advanced without a clear and transparent evidence base. The **Site Allocations & Designations** do not accurately reflect the nature value of at least 2 significant open spaces. As the BAP is not being progressed the Local Plan is not consistent with London Plan 2011's requirement that species/habitats protection and enhancement/extent is through BAP targets.

Part 2 Policy DMEI 7 is not consistent with national policy and does not have sufficient regard to national guidance. Planning Policy Guidance Natural Environment says that the NPPF is clear that pursuing Sustainable Development includes moving from a net loss of biodiversity to achieving net gains for nature (e.g. NPPF para 109). From Part 2's Sustainability Appraisal, Recommendation 1 related to Policy DMEI 7: to be revised to ensure that it requires a net environmental gain in line with NPPF. The Policy, even when read with Part 1 Policy EM7 does not ensure this.

SCHOOL SITE 2 LAKE FARM, HAYES (Site Allocations & Designations)

This is shown as the extent of land subject to the Council's Appropriation of Open Space Order and not the lesser, actual extent of the school premises as recently completed. The Appropriation was made with, among other things, the possibility that temporary classrooms would be required to meet the September 2014 opening date set for the school. So a larger footprint than necessary to accommodate the school premises was appropriated. This is no longer necessary factor in delimiting the School Site in this area of Green Belt on what is and was much valued locally. In the interests of nature conservation, the provision of public open space and accuracy, the School Site 2 should be redrawn to fit the actual perimeter boundary of the school. There are no known plans to expand this recently completed school. Both nature conservation and public open space provision are recognized in the Local Plan and associated studies to be challenged now and in the future.

OPEN SPACE etc

Part 1 Policy EM4 Open Space & Informal Recreation asserted that the Council will identify new opportunities for open space through an Open space Strategy (OSS). And that its implementation would bring forward a policy for Areas of Environmental Opportunity. Part 2 **Atlas of Changes** proposes that this designation in the UDP Proposals Map be deleted.

Part 2 **Development Management** para 7.29 seeks to protect open space provision and promote the provision of new open spaces in the areas of deficiency identified in the OSS, but such have not been brought forward in Part 2 **Atlas of Changes, Policies Map and Site Allocations & Designations**. This is not in conformity with the London Plan 2011 Policy 7.18C Protecting Open Space and Addressing Deficiencies, wherein boroughs should: a) include appropriate designations and

policies for the protection of local open space, b) identify areas of open space deficiency etc, c) future open space needs are planned in areas with potential for substantial change.

Part 1 Policy CI 2 & 3 monitoring sections stated that individual allocations of land relating to leisure and recreation will be set out in Part 2 **Site Allocations & Designations**. This has not been advanced in Part 2.

National planning policy (NPPF paras 76-78) introduced a new designation, Local Green Spaces, which are important to neighbourhoods, local in character and small-scale, but Part 2 has not considered such.

Part 2 offers no steer for neighbourhood planning and in **Policy DMCI 8 Planning Obligations & CIL**, with its accompanying text, does not set out arrangements for allocating the proportion of CIL receipts to local communities.

Part 1 Policy EM8 Land, Water, Air and Noise promised that Part 2 would identify and protect Quiet Areas. Defra in consulting on draft Noise Action Plans in 2013 (produced to meet the terms of the Environmental Noise (England) Regulations 2006/Environmental Noise Directive) identified that small parts of Metropolitan Open Land and Local Green Spaces as potential quiet areas that boroughs may wish to designate. Part 2 has not addressed this and is inconsistent with national policy.

EMPLOYMENT LAND:

National planning policy requires the setting out of a clear economic vision and strategy for the area, positively and proactively encouraging sustainable economic growth. Whilst Part 2 **Site Allocations & Designations, Atlas of Changes** brings forward designations for SIL, LSIS & LSEL, a number of sites presently UDP Plan designated Industrial & Business Areas would not be selected for these (new) designations. And not all of them are to be subject of Site Allocations SAs. Consequently, the likely loss of employment sites may well be in excess of that predicted by the Employment Land Study and contrary to the London Plan's policies and SPG. These areas are clustered in and around Hayes Town vicinity and with the advancement of residential on allocated sites, this will be to the economic disadvantage of local business and employees.

ORIGINS OF REPRESENTATIONS:

Those on Air Quality originate from 2 public meetings held in Hayes convened on this specific issue of air pollution in 2012 which were attended by 32 and then by about twenty local residents and representatives of local organisations. A more recent meeting on Part 2 of the Local Plan attended by 14 local organization representatives on 16th October 2014 refreshed the discussions.

Those on Nature Conservation, School Site and Open Space. originate from discussions at various meetings of the Friends of Lake Farm Country Park which meets quarterly to progress the management and improvement of the park and its environs. Invitations are sent to about ninety local residents and representatives of local organisations, and about ten persons attend.

Those on Neighbourhood Planning and on CIL originate from 2 public meetings held earlier this year to propose the forming of a Neighbourhood Forum to develop a Neighbourhood Plan for the Heathrow Villages which were attended by about twenty persons from these localities on each occasion.

Those on Electric Vehicle Parking and on Quiet Areas originate from my participation in the EiP on the Further Alterations of the London Plan on behalf of Just Space, a London wide community led network promoting community engagement in planning.

Those on Employment Land originate from discussions held at public meeting to discuss principally the Nestles site, Hayes in July 2014 attended by some thirty local residents and representatives of local organisations. Employment Land and Residential Development issues were also discussed at the 16 October 2014 meeting mentioned above.

END

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

I would like: to take part in the debate and respond to the representations and proposed changes of other participants;
the opportunity to explain clearly the changes I am seeking and provide up to date information;
to respond to new evidence base documents produced by the Council; and
to respond to relevant changes in national and regional policy.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

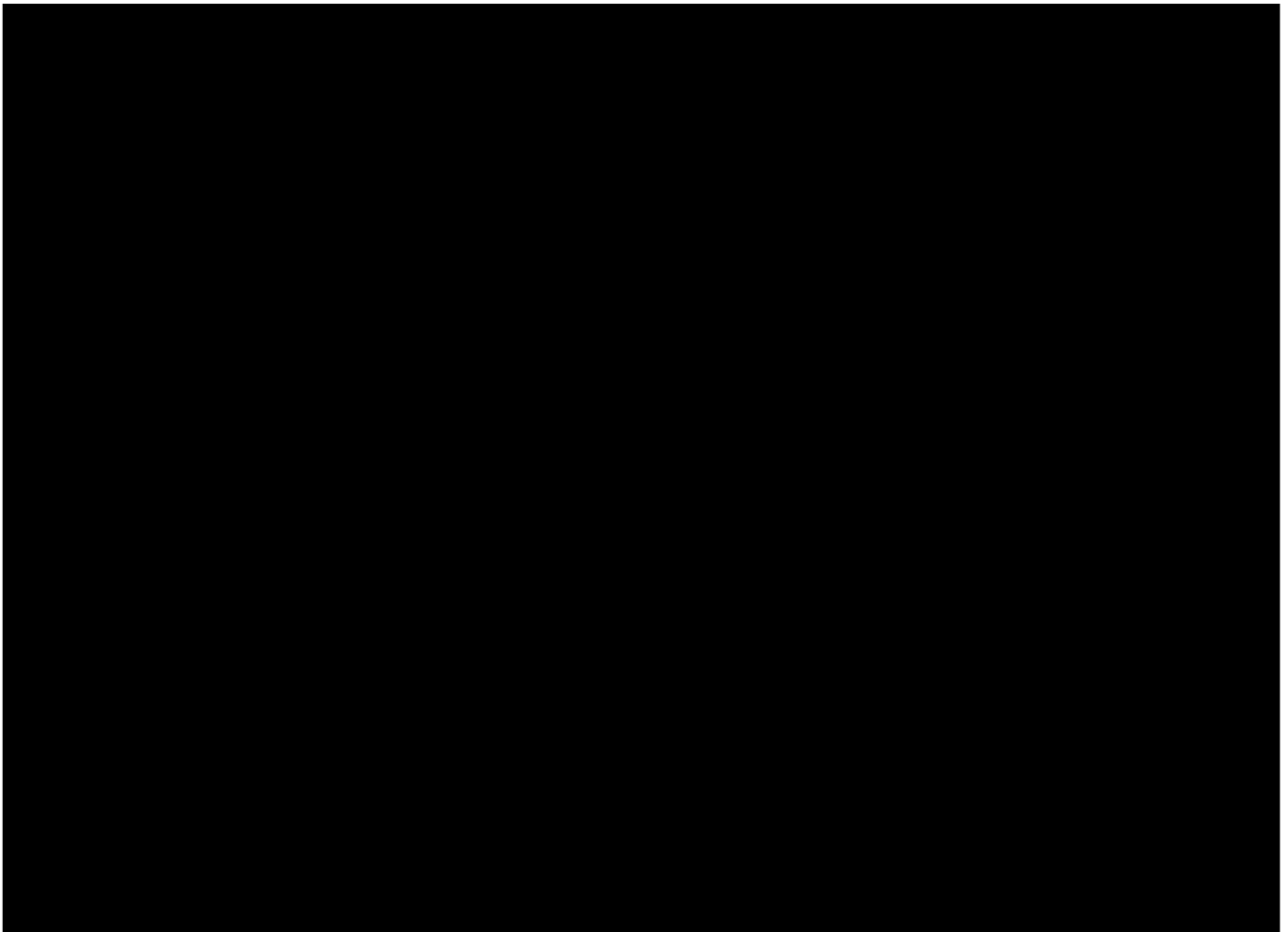
- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.



Consultation Response Local Plan Part 2

on Behalf of

Greater Manchester Pension Fund

Our Ref: C14015

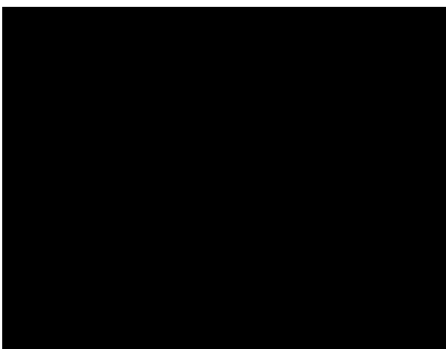
November 2014





Phase 2

PLANNING &
DEVELOPMENT
LIMITED



1. Introduction

- 1.1 These representations are prepared on behalf of the Greater Manchester Pension Fund (GMPF) and respond to the Local Plan Part 2 Proposed Submission Site Allocations and Designations consultation document. GMPF are landowners and promoters of The Argent Centre, Pump Lane, Hayes. The land is currently designated as industrial land, however due to a continuing decline in demand and letting, GMPF consider the site is available, suitable and deliverable for alternative uses.
- 1.2 These representations consider the ‘soundness’ of the Proposed Submission Site Allocations and Designations consultation document. It is our submissions that the Proposed Submission Site Allocations and Designations consultation document as drafted is ‘unsound’. The substance of our representations is set out in section 2.0 and in section 3.0 we detail the changes we consider necessary to make the document sound.
- 1.3 Our response is in relation to draft Policy S18 and Policy SEA1.

2. Representations

- 2.1 This section examines the key objections to document which lead us to conclude that the DPD is not ‘sound’. Our findings are linked to the tests of soundness identified by The Planning Inspectorate (PINS). These representations include information and evidence to support the objectors submission and identifies the changes to the DPD sought by the objector and suggested amendments.

Soundness

Under the Planning and Compulsory Purchase Act 2004 an Inspector is charged with checking that the Development Plan Document (DPD) is “sound”.

- 2.2 To be ‘sound’ a DPD should be:
- justified;
 - effective; and
 - consistent with national policy.
- 2.3 To be “justified” the DPD must be:
- (i) founded on a robust and credible evidence base; and
 - (ii) the most appropriate strategy when considered against the reasonable alternatives.
- 2.4 To be “effective” the DPD must be:
- (i) deliverable;
 - (ii) flexible; and

-
- (iii) able to be monitored.
- 2.5 We object to the proposed status of the Argent Centre as a ‘Strategic Industrial Location’ and the DPDs failure to identify the Argent Centre as being a potential area for managed release of employment land. The DPD current approach in this regard is not “sound” because it is not “justified”.
- 2.6 Hillingdon’s Position Statement on Employment Land and Retail Capacity (2010) reveals that 17.58ha of surplus industrial and warehousing land could be released in the Borough from 2011-2026. This is equivalent to 4.9% of the total current designated employment land in the borough and 1.5% of Strategic Industrial Land.
- 2.7 The Local Plan Part 1 sets out in general terms that there is a total of 358ha of employment land designated as part of the spatial strategy, with 17.58ha of employment land to be released but an additional 13.68ha of new allocations. Therefore the Local Plan Part 1 plans for only a 3.9ha release of employment land when the proposed new allocations are brought into account. This is equivalent to release of 1% of the total current designated employment land in the borough. This is significantly below the evidence, which identifies the need for a larger release of industrial land.
- 2.8 It is therefore submitted that there is a need for further employment/ industrial land release in the DPD, as identified by the Council’s own evidence base, to meet other development objectives.
- 2.9 The Argent Centre comprises approximately 1.5ha of employment land. The site is approximately a 400 metre walk from the primary shopping area in Hayes town centre. Adjoining the site to the west is a Matalan store. Unit 1 in the Argent Centre (17,950 sq ft) has a trading B&M store with a comparison goods retailing consent. This location, and the Argent Centre, have therefore historically been subject to incremental release from industrial uses and lend themselves to supporting the provision of the Hayes town centre.
- 2.10 Capita Symonds is responsible for the management of the Argent Centre and has provided key evidence (**Appendix 1**) in relation to the market demand for employment/industrial space at the site and the local market in Hayes.
- 2.11 The overall advice is that there is currently a significant over-supply of comparable warehouses in Hayes, with circa 500,000 sq ft of space in the immediate surrounds, and little demand for Hayes as a location. With the near proximity to Heathrow and Park Royal, London’s predominant industrial locations, experience shows that tenants would prefer to locate there.
- 2.12 Therefore the foregoing has demonstrated a surplus of employment land in the Borough requiring release to alternative uses. However, the Local Plan Part 1 does not make provision to release sufficient sites to alternative use. Hayes, as an industrial location, is losing out to neighbouring locations and therefore there is an oversupply of available employment/industrial space. It is therefore no surprise that the Argent Centre has
-

experienced a continual decline in the uptake of industrial space. Accordingly, parts of the site is therefore identified as surplus to employment/industrial requirements and is suitable for alternative uses.

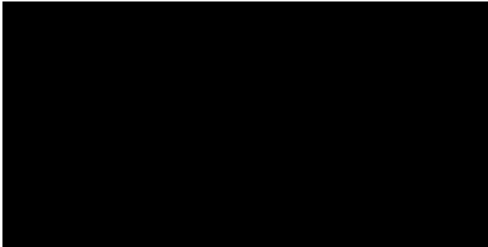
- 2.13 The use of parts of the site to non employment based uses would not have a significant effect on employment land provision in the Borough. The addition of the site to existing planned release would amount to a 1.5% reduction in the Borough's employment land allocations. This is clearly insignificant to the overall supply but important to the regeneration of land at Pump Lane, Hayes.
- 2.14 In terms of alternative uses GMPF evidence points towards market appeal for retail led uses at the site. Indeed the site is approximately a 400 metre walk from the primary shopping area in Hayes town centre. Crossrail will be a catalyst for growth and regeneration in this corridor, particularly around Hayes town centre. Retail led development would inject much needed regeneration into area which is in need of an improved environment.
- 2.15 The available evidence identifies Hayes for growth to its town centre of 3,350 sq.m of comparison retail floorspace for the plan period to 2026.
- 2.16 In the case of Hayes, given the limited size and product range, the existing town centre convenience stores are only likely to provide for the top-up shopping needs of the local area. Main food shopping needs are met elsewhere, in other centres or at out-of-centre stores. The provision of a new convenience shopping nearby could help to recapture some of this "leaked" main food shopping expenditure.
- 2.17 The Council's Position Statement (2010) provides updated findings on the need for new comparison floorspace. Utilising revised consumer expenditure and population data, the statement considers that there will be a need for 1,594 sq m of additional comparison floorspace in Hayes town centre by 2021 and 3,345 sq m by 2026. This highlights that the findings of the Town Centres and Retail Study are increasingly out-of-date and that the whole report, covering all types of retail use, should be revisited by the Council. It is very likely that such update will show a requirement for more convenience floorspace.
- 2.18 It is therefore submitted that there is a requirement for convenience retailing in Hayes in addition to comparison goods. This will make the DPD "sound".
- 2.19 Accordingly, there is a requirement for a significant edge of centre location in Hayes to accommodate the level of retail floorspace and expenditure leaked to other neighbouring centres. The Council is proposing to release the Chailey Industrial Estate for mixed use development, however it is submitted that the Argent Centre, specifically the vacant units along the Pump Lane frontage, is well placed being only a 400 metre walk from the primary shopping area in Hayes town centre.
- 2.20 The town centre has already incrementally extended along Pump Lane with the Matalan store adjacent and the existing B&M store at Unit 1 Argent Centre. It is therefore submitted that part of the Argent Centre should be specifically identified in the CS as a site for release

from employment and shown as a future extension to the Hayes town centre. We believe the site would be complimentary to the proposed extension of the town centre onto the Chailey Industrial Estate. The evidence of retail need illustrates that both sites would be required. We envisage a comprehensive redevelopment would bring significant social, economic and environmental improvements to Hayes town centre. This will help trap leaked expenditure and growth in the town.

- 2.21 To make the DPD “effective” and therefore “deliverable” Policy 18 and Policy SEA 1 should be amended to include reference to the Argent Centre at Pump Lane, Hayes as suitable for release from employment/industrial allocation. The site is ‘available’, ‘deliverable’ and ‘suitable’ for alternative uses and would specifically meet an identified need for additional comparison and convenience retailing.
- 2.22 We are therefore seeking a change to the DPD as set out in **Appendix 2** to make the DPD “sound”.

Appendix 1

7th April 2014



Dear Michael,

Re: Units 2 & 3, The Argent Centre, Pump Lane Hayes, UB3 3BS

The attached note is an outline summary of Capita Property and Infrastructure Ltd's (formerly Capita Symonds) marketing initiatives with regards to The Argent Centre, Hayes.

Background to the property and our instruction

- Capita Property and Infrastructure's (formerly Capita Symonds) were formally instructed to market Units 2 and 3 (20,355 sq ft) in June 2012.
- The units were occupied and refurbished by Vodafone as part of their dilapidations. Vodafone vacated in March 2013. They chose not to renew their lease on expiry following a national data centre review.
- The units were undergoing dilapidation repair works when we were instructed.
- Our marketing initiatives and recommendations to our client included producing marketing particulars, erecting a sign board on the unit and on the corner of Pump Lane/Silverdale Road, listing the warehouse on dedicated property listing websites, and conducting a direct mail-out to local occupiers, which was subsequently followed up with direct telemarketing.
- The units remain vacant to date and there is no sign of the market returning for commercial/industrial use given a general oversupply of this type of property space in the Hayes area and a general lack of demand.
- Despite some recovery in the market there remains a generally poor demand with an oversupply that's likely to remain for the short to medium term.

Marketing to date

To date Capita have undertaken an extensive marketing campaign in an attempt to raise the profile of the estate in the local and wider community. This campaign included:

- Creation of a detailed website (www.argentcentre.co.uk)
- Video tour of the estate
- Marketing brochure detailing the properties salient details (see attached)
- Local and National occupier mailing
- Marketing board on Pump Lane as well as the units
- Refurbishment of the units to a high standard
- Telemarketing – 70 people called per day over 1 month
- EPC

Despite this, demand for the units from industrial occupiers has been limited.

Statistics

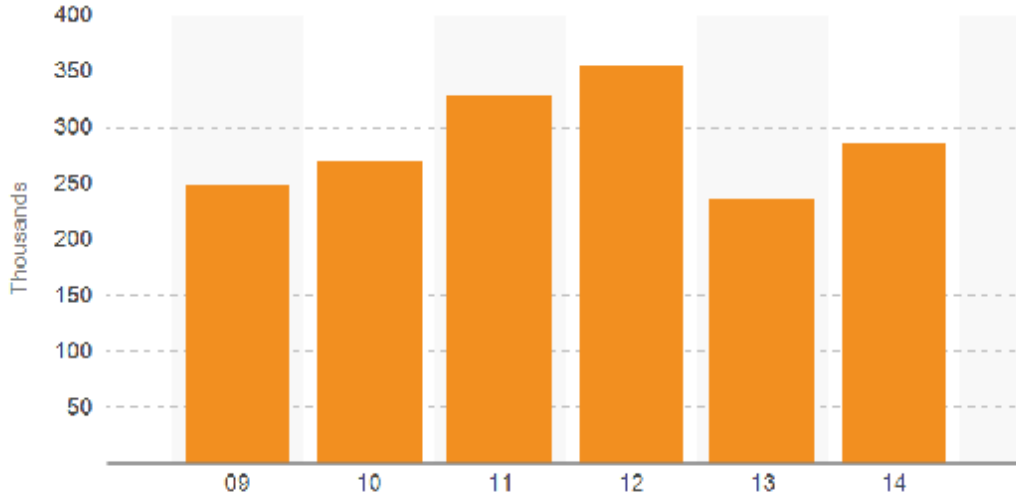
At the time of bringing the units to the market, there was a significant over-supply of comparable



CAPITA

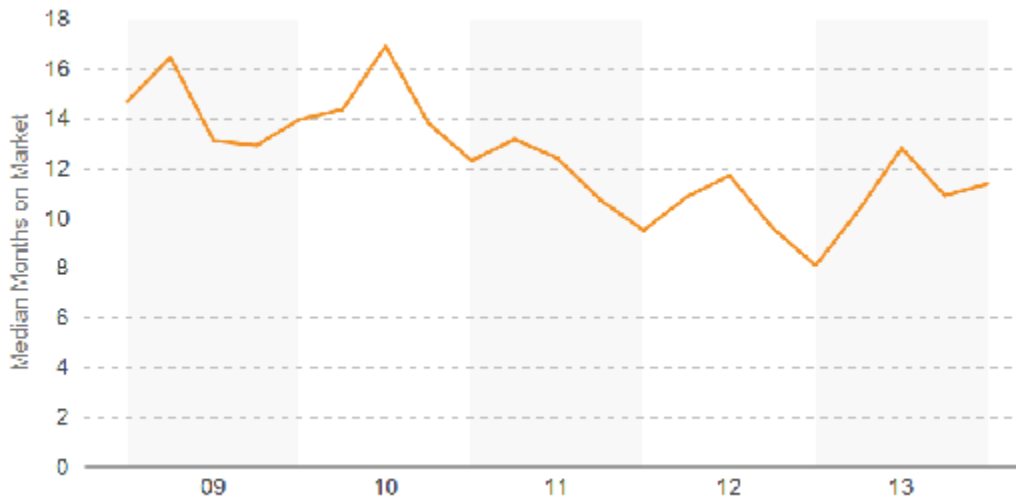
warehouses in Hayes, with circa 350,000 sq ft of space in the immediate surrounds of a two mile radius. Over the past 21 months the available space has reduced to approximately 275,000 sq ft, however interest in The Argent Centre has remained low. This is most likely a direct result of an oversupply of competing properties in the surrounding area.

Industrial Availability within 2 miles



The oversupply of industrial accommodation in the surrounding area has resulted in a 5 year average void period of c. 13 months. Please note this property has been on the market for 21 months.

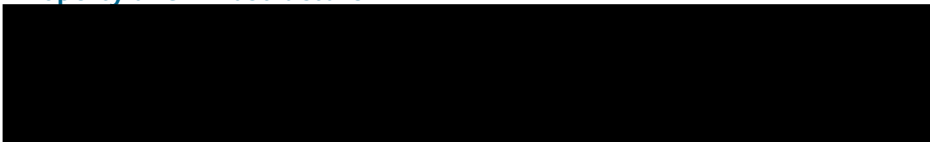
Average Industrial Void periods



Recent experience has shown that tenants would prefer to take space in the nearby areas of Heathrow and Park Royal, London's predominant industrial locations, rather than Hayes. This is made worse by the congestion on the A312 during peak hours. As a result deals for units of a similar size to Units 2 and 3 in the immediate vicinity have been few and far between.

We expected more industrial interest than has been received and given the oversupply our client is now looking to a retail user as a solution to their void.

Property and infrastructure



Enquiries and Requirements

Below is a summary of the main enquiries we are following for the estate.

<u>Requirement</u>	<u>Size from (sq ft)</u>	<u>Size to (sq ft)</u>	<u>Area</u>
Client of Strutt and Parker	10,000	15,000	West London
Kooltech Ltd	10,000	15,000	West London
Abbey Cards Ltd	10,000	15,000	West London A40 /A4 /A406
Sint Ltd	5,000	15,000	Corridor/Triangle Park Royal to Southall
Client of DE&J Levy	2,500	3,500	Southall

Please find enclosed a list of current availability within a 2 mile radius and details of the units time on the market.

The vacancy rate on the estate is also likely to increase over the next 3 months, with the following events:

- The tenant in unit 8 is indicating they will look to exercise their break option in June 2014.
- Units 4 and 5 remain vacant since June 2012 following Zumtobel's lease expiry
- Unit 7 (6,000 sq ft) - the current tenant has some financial difficulties and we fear that the unit will be handed back to the Landlord shortly
- Unit 10 (10,267 sq ft) – the current tenant has some financial difficulties and we fear that the unit will be handed back to the Landlord shortly.

In summary, this is a well presented estate and we believe we have done everything we can to let the units. Despite this we have been unable to address the significant void periods on the estate. Furthermore Unit 3 and 4 have recently been vandalised by two illegal raves which has increased the financial burden of the void on our client. It is therefore more important than ever that we find a solution to the vacancies on the estate.

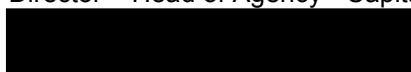
We consider the available evidence points towards the need for a further extension to the Hayes town centre to include the Argent Centre. This will present an opportunity to regenerate the area and trap leaked retail expenditure outside of Hayes. Tenant demand in Hayes continues to be low with few new enquiries or requirements for industrial space, and aside from a deal at one unit in the Argent Centre, the evidence of the last 24 months illustrates that the situation is unlikely to change in the immediate future, particularly as tenants continue to favour locations such as Heathrow and Park Royal, both being a short drive away.

Yours sincerely



Andrew M Smith FRICS MBA

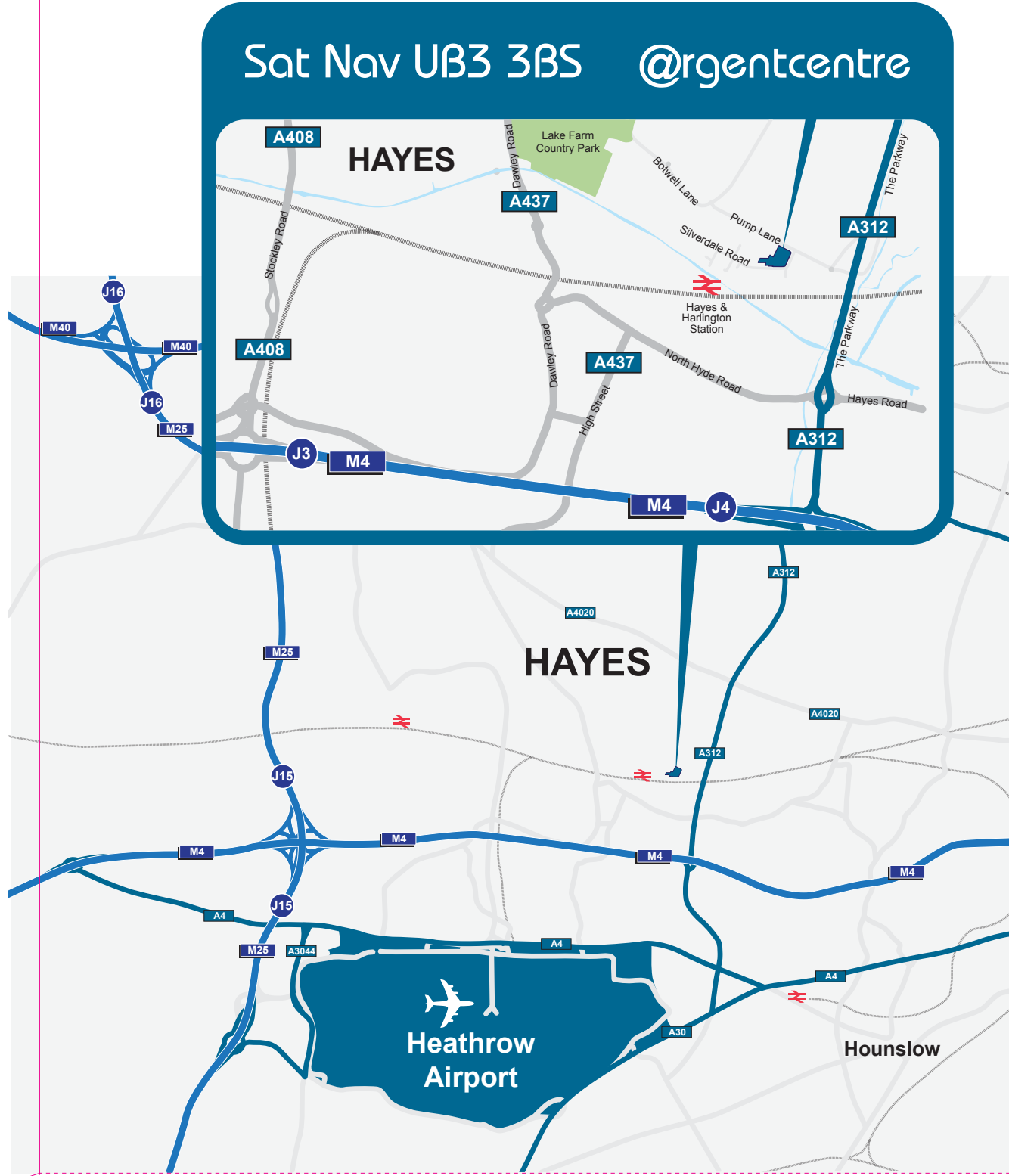
Director – Head of Agency - Capita Property and Infrastructure



Encl. (Marketing details, schedule of vacant units in the area and schedule of time on the market)

Property and infrastructure





COMMUNICATIONS

The Argent Centre is situated on Pump Lane and is only a short walk from Hayes town centre. The estate benefits from good communication links being in close proximity to the M4, M25, A40 and Heathrow Airport. Hayes and Harlington station is just a short walk away and provides regular connections to London Paddington in 20 minutes, Reading and the West Country. Hayes and Harlington station will provide access to the Crossrail route which opens in early 2019.

DISTANCES

A312	0.5 miles	2 minutes
A40	3.7 miles	9 minutes
M4 Junction 3	1.6 miles	5 minutes
M25	5.4 miles	9 minutes
Hayes & Harlington Station	0.7 miles	3 minutes
Heathrow Airport	5 miles	10 minutes

LEASE TERMS

Available on a new FRI lease for a term to be agreed.

SERVICE CHARGE

The service charge is currently running at about £0.35 per sq ft.

LEGAL COSTS

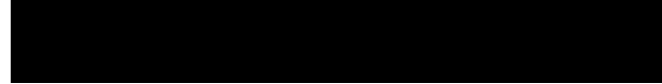
Each party to bear their own legal costs incurred in any transaction.

RATEABLE VALUES

Please refer to the London Borough of Hillingdon (Tel: 01895 556699) for the individual rateable values of each unit and the rates payable.

VIEWING

By prior appointment only. To arrange a viewing please contact:
 Andrew Smith James Shillabeer



CAPITA SYMONDS
 020 7544 2000



Misrepresentation Act 1967: Note: Capita Symonds is Part of The Capita Group Plc. for itself and as agent for the vendors or lessors (the "Seller") of this property, gives notice that (1) These particulars do not constitute any part of an offer or a contract (2) Whilst every attempt has been made to ensure accuracy, this cannot be guaranteed and, therefore (save as set out at (6) below), (a) all statements and descriptions in these particulars as to this property are made without responsibility or liability on the part of CAPITA SYMONDS or the Seller, (b) no such statements or descriptions are to be relied on as statements or representations of fact (c) all measurements are approximate and no responsibility is taken for any error, omission or misstatement and (d) any intending purchasers or lessees must satisfy themselves by inspection or otherwise as to the correctness of each of the statements, descriptions and measurements contained in these particulars (3) The Seller does not make or give, and neither CAPITA SYMONDS nor any of its employees or agents makes or gives nor has any authority to make or give, any representation or warranty whatsoever in relation to this property. (4) Unless otherwise stated, all prices and rents are quoted exclusive of VAT and no statement is made as to the incidence of VAT. (5) No liability is accepted and no representation is made by either CAPITA SYMONDS or the Seller in respect of the presence, condition, adequacy or usability of any telecommunications or computer systems or equipment at the property, any software loaded thereon, or any related cabling or infrastructure. (6) Nothing herein shall exclude any liability which either the Seller or CAPITA SYMONDS would otherwise have for any fraudulent concealment or for any statements made fraudulently by it, its employees or agents.

COMPILED AND CREATED BY IMPACT CREATIVE SERVICES, SEPTEMBER 2012

@rgentcentre
 PUMP LANE, HAYES, MIDDLESEX UB3 3BS

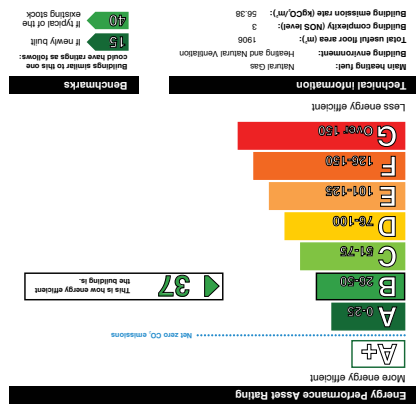


**TO LET: 10 SELF-CONTAINED INDUSTRIAL/WAREHOUSE UNITS
 IN A HIGH QUALITY SECURE ENVIRONMENT**
 3,817 sq ft – 18,104 sq ft (354.6 sq m - 1,681.9 sq m) GIA

www.argentcentre.co.uk

SPECIFICATION

- Portal frame construction with brick and profile steel clad elevations
- Eaves height 5.9m/19.4 ft rising to 7.48m/24.5 ft at the apex
- Electrically operated roller shutter doors
- As built office accommodation
- Dedicated car parking spaces (additional car parking off site)
- Secure well maintained site



*This is the EPC for unit 1, please refer to the website for the other units EPC's available for the units to let.

@rgentcentre

PUMP LANE, HAYES, MIDDLESEX UB3 3BS

DESCRIPTION

The Argent Centre is one of Heathrow's premier industrial estates and comprises 10 self contained warehouse units ranging in size from 3,817 sq ft - 18,104 sq ft (354.6 sq m - 1,681.9 sq m).



Loading area to the rear of unit 1



Turning area and front of unit 10



Aerial view from Silverdale road



Outside units 5, 6 and 7



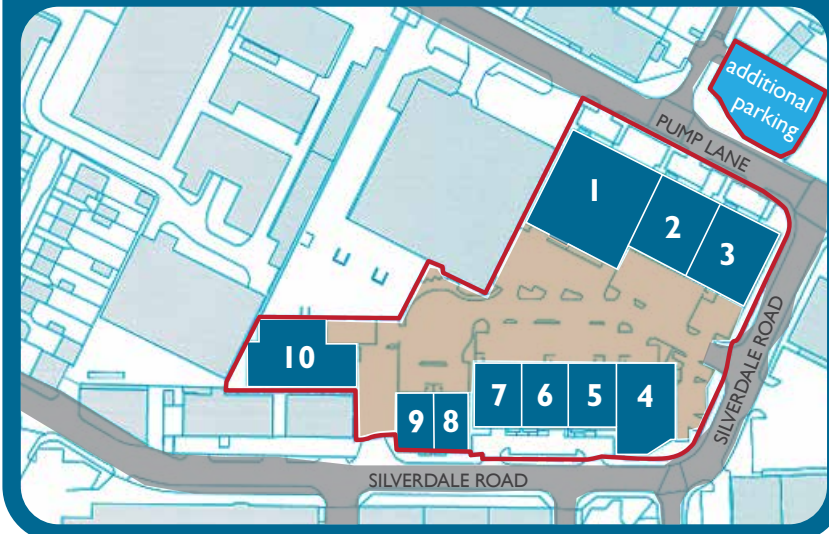
Aerial view from Pump Lane



Front view of units 7, 8 and 9



Site Plan



Unit 1	18,104 sq ft	1,681.9 sq m
Unit 2	9,368 sq ft	870.3 sq m
Unit 3	10,987 sq ft	1,020.7 sq m
Unit 4	9,851 sq ft	915.1 sq m
Unit 5	5,860 sq ft	544.5 sq m
Unit 6	5,760 sq ft	535.1 sq m
Unit 7	5,763 sq ft	535.3 sq m
Unit 8	3,825 sq ft	355.3 sq m
Unit 9	3,817 sq ft	354.6 sq m
Unit 10	10,267 sq ft	953.8 sq m
Total	83,602 sq ft	7,766.6 sq m

*additional parking available separately just off site if required.



Industrial Property within 2 miles of Argent - Days on the Market

Building Name	Building Park	Street No	Street Name	Postcode	Sq M Available	Avail Date	Rent Sq Ft	Days on Market
		187	Bilton Way	UB3 3NF	514	Avail now	NQ	81
	International Trading Estate	9	Boeing Way	UB2 5LB	2,987	01/12/2011	£8.50	815
		3	Boeing Way	UB2 5LB	1,339	01/10/2012	£5.95	392
		4	Boeing Way	UB2 5LB	1,520	01/04/2013	£5.95	200
	International Trading Estate	1	Boeing Way	UB2 5LB	767	01/04/2013	£6.00	720
	International Trading Estate	8	Boeing Way	UB2 5LB	3,022	01/06/2010	£5.95	1244
		161	Brent Road	UB2 5LJ	1,252	01/07/2011	£5.00	972
Block 9	Unit 9c Chancerygate Business Centre		Brent Road	UB2 5LJ	1,668	01/08/2013	£9.50	235
Block 10	Unit 10b Chancerygate Business Centre		Brent Road	UB2 5LJ	868	17/09/2011	£9.75	1270
		169	Brent Road	UB2 5LE	1,430	01/12/2012	£6.50	378
	Unit G3 Middlesex Business Centre		Bridge Road	UB2 4AB	822	01/01/2007	£6.00	2252
	Unit G4 Middlesex Business Centre		Bridge Road	UB2 4AB	822	Avail now	£6.00	727
	Unit 211		Chesterfield Way	UB3 3NW	605	01/12/2013	£10.75	164
	C Parkway West		Cranford Lane	TW5 9QA	2,140	01/05/2012	£3.50	844
	Unit 9		Hayes Road	UB2 5XJ	648	01/11/2014	£11.95	305
	Unit 1		Hayes Road	UB2 5XJ	86	01/11/2014	£11.95	305
	Unit 7		Hayes Road	UB2 5XJ	903	01/11/2014	£11.95	305
	Unit 8		Hayes Road	UB2 5XJ	731	01/11/2014	£11.95	305
	Unit 6		Hayes Road	UB2 5XJ	486	01/11/2014	£11.95	305
	Unit W3 Western International Park		Hayes Road	UB2 5XJ	520	Avail now	£11.15	661
	Unit 7c Heston Centre		International Avenue	TW5 9NJ	1,175	Avail now	£8.50	2755
Westlands 3	Westlands Estate		Millington Road	UB3 4AZ	7,119	Avail now	£11.50	1729
Bulls Bridge Distr			North Hyde Gardens	UB3 4QR	471	Avail now	£10.79	91
Unit 166			Pasadena Close	UB3 3NQ	470	01/01/2014	£10.50	19
	Unit 5 Caxton Trading Estate		Printing House Lane	UB3 1BE	5,498	Avail now	NQ	738
	Unit 5 Craufurd Industrial Estate		Silverdale Road	UB3 3BN	595	Avail now	£4.70	138
	Unit 3		Silverdale Road	UB3 3BN	467	01/09/2011	£7.16	893
Argent Centre	Unit 5		Silverdale Road	UB3 3BL	1,490	01/06/2012	£9.75	864
	Unit 2 Trinity Trading Estate		Silverdale Road	UB3 3BN	1,322	Avail now	NQ	25
	Unit 2 Silverdale Industrial Estate		Silverdale Road	UB3 3BL	3,071	Avail now	£3.63	893
	Unit 24 Airlinks Industrial Estate		Spitfire Way	TW5 9NR	1,834	Avail now	NQ	283
	Unit 5 Waterway Park		Swallowfield Way	UB3 1AW	894	01/04/2013	£9.50	164
	Unit 2 Swallowfield Centre		Swallowfield Way	UB3 1DQ	500	01/07/2013	£10.00	102
	Unit 4e Swallowfield Way Ind. Estate		Swallowfield Way	UB3 1DQ	1,941	01/09/2009	£7.50	1622
	Unit 4c Swallowfield Way Ind. Estate		Swallowfield Way	UB3 1DQ	3,888	01/12/2011	£7.50	1622
		64a	The Green	UB2 4BG	1,184	01/07/2011	£4.71	956
	8 Clayton Business Centre		Trevor Road	UB3 1RT	903	01/06/2012	£10.50	712
	6 Clayton Business Centre		Trevor Road	UB3 1RT	641	Avail now	NQ	453
	International Trading Estate	8	Trident Way	UB2 5LF	3,300	01/10/2009	£5.50	3230
	International Trading Estate	5	Trident Way	UB2 5LF	5,110	01/12/2010	£5.50	1182
Unit 1			Uxbridge Road	UB4 0JU	2,574	Avail now	NQ	350

**5,000 to 30,000 sq ft within 2
miles of The Argent Centre**

187 Bilton Way, Hayes, UB3 3NF

Hayes, UB3 3NF
Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built Jul 1981**
Building Size: **7,070 SF**
Land Area: -
Stories: **1**
Parking: **10 Surface Spaces are available; Ratio of 1.93/1,000 SF**
For Sale: **Not For Sale**

Space Avail: **5,530 SF**
Max Contig: **5,530 SF**
Smallest Space: **5,530 SF**
Rent/SF/Yr: **Withheld**
% Leased: **100%**



Landlord Rep: **Graves Jenkins / David Bessant 01293 401040**

International Trading Estate, 1-2 Boeing Way, Southall, UB2 5LB

AKA 1 Boeing Way
Southall, UB2 5LB
Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built Feb 1989**
Building Size: **19,597 SF**
Land Area: -
Stories: **1**
For Sale: **Not For Sale**

Space Avail: **8,251 SF**
Max Contig: **8,251 SF**
Smallest Space: **907 SF**
Rent/SF/Yr: **£6.00/tbd**
% Leased: **57.9%**



Landlord Rep: **Vail Williams LLP / Peter Freeman 020 8564 8300**
Dominic Faires 020 8564 8300

Leasing Company: **Lambert Smith Hampton Ltd / -- 8,251 SF (907-7,344 SF)**

International Trading Estate, 3-4 Boeing Way, Southall, UB2 5LB

AKA 3 Boeing Way
Southall, UB2 5LB
Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built Dec 1980**
Building Size: **30,780 SF**
Land Area: -
Stories: **2**
For Sale: **Not For Sale**

Space Avail: **30,780 SF**
Max Contig: **16,362 SF**
Smallest Space: **1,655 SF**
Rent/SF/Yr: **£5.95/tbd**
% Leased: **0%**



Landlord Rep: **Vail Williams LLP / Dominic Faires 020 8564 8300 -- 30,780 SF /6,619 ofc (1, 655-14,707 SF)**

International Trading Estate, 9 Boeing Way, Southall, UB2 5LB

Southall, UB2 5LB

Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built Jul 1995**
Building Size: **32,528 SF**
Land Area: -
Stories: **1**
For Sale: **Not For Sale**

Space Avail: **32,151 SF**
Max Contig: **32,151 SF**
Smallest Space: **3,928 SF**
Rent/SF/Yr: **£8.50/tbd**
% Leased: **1.2%**



Landlord Rep: **Telsar Ltd / Bal Panesar 01895 819911 -- 32,151 SF (3,928-28,223 SF)**

Block 10, Brent Rd, Southall, UB2 5LJ

AKA Brent Rd

Southall, UB2 5LJ

Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built May 2008**
Building Size: **51,847 SF**
Land Area: -
Stories: **4**
For Sale: **Not For Sale**

Space Avail: **9,342 SF**
Max Contig: **9,342 SF**
Smallest Space: **1,905 SF**
Rent/SF/Yr: **£9.75/fri**
% Leased: **82.0%**



Landlord Rep: **David Charles Property Consultants / Peter Amstell 020 8429 9007 -- 9,342 SF (1,905-7,437 SF)**

Block 9, Brent Rd, Southall, UB2 5LJ

AKA Brent Rd

Building Type: **Warehouse**

Space Avail: **17,952 SF**

Star Rating: ★★☆☆☆

Max Contig: **17,952 SF**

Southall, UB2 5LJ

Building Status: **Built Jul 2008**

Smallest Space: **1,388 SF**

Middlesex County

Building Size: **41,260 SF**

Rent/SF/Yr: **£9.50/fri**

Land Area: -

% Leased: **56.5%**

Stories: **2**

For Sale: **Not For Sale**



Seller Rep (Condo): **Company information unavailable at this time**

155-161 Brent Rd, Southall, UB2 5LJ

AKA 157-57 Brent Rd

Building Type: **Warehouse**

Space Avail: **13,472 SF**

Star Rating: ★★☆☆☆

Max Contig: **13,472 SF**

Southall, UB2 5LJ

Building Status: **Built Jan 1963**

Smallest Space: **13,472 SF**

Middlesex County

Building Size: **40,126 SF**

Rent/SF/Yr: **£5.00/tbd**

Land Area: -

% Leased: **66.4%**

Stories: **3**

For Sale: **Not For Sale**



Landlord Rep: **Vail Williams LLP / Dominic Faires 020 8564 8300 -- 13,472 SF (13,472 SF)**

169 Brent Rd, Southall, UB2 5LE

Southall, UB2 5LE

Building Type: **Warehouse**

Space Avail: **15,393 SF**

Star Rating: ★★☆☆☆

Max Contig: **15,393 SF**

Middlesex County

Building Status: **Built Jun 1976**

Smallest Space: **15,393 SF**

Building Size: **15,393 SF**

Rent/SF/Yr: **£6.50/tbd**

Land Area: -

% Leased: **0%**

Stories: **1**

For Sale: **Not For Sale**



Landlord Rep: **Jones Lang LaSalle / George Higgins 020 7852 4052 -- 15,393 SF (15,393 SF)**

Middlesex Business Centre, Bridge Rd, Southall, UB2 4AB

AKA Bridge Rd

Building Type: **Light Manufacturing**

Space Avail: **17,696 SF**

Star Rating: ★★☆☆☆

Max Contig: **8,848 SF**

Southall, UB2 4AB

Building Status: **Built Sep 1995**

Smallest Space: **8,848 SF**

Middlesex County

Building Size: **17,696 SF**

Rent/SF/Yr: **£6.00/tbd**

Land Area: -

% Leased: **50.0%**

Stories: 4

Parking: **16 Surface Spaces are available**

For Sale: **Not For Sale**



Landlord Rep: **Monarch Commercial Ltd / Tony Khurli 020 8569 8500**
Harry Sohal 020 8569 8500

Leasing Company: **Jones Lang LaSalle / -- 17,696 SF (8,848 SF)**

Chesterfield Way, Hayes, UB3 3NW

AKA 2 Chesterfield Way

Building Type: **Warehouse**

Space Avail: **6,507 SF**

Star Rating: ★★☆☆☆

Max Contig: **6,507 SF**

Hayes, UB3 3NW

Building Status: **Built Nov 1993**

Smallest Space: **936 SF**

Middlesex County

Building Size: **27,346 SF**

Rent/SF/Yr: **£10.75/fri**

Land Area: -

% Leased: **76.2%**

Stories: 2

For Sale: **Not For Sale**



Landlord Rep: **Altus Edwin Hill / Andy Cole 01753 561805**

Leasing Company: **Jones Lang LaSalle / -- 6,507 SF /6,507 ofc (936-5,571 SF)**

Parkway West, Cranford Ln, Hounslow, TW5 9QA

Hounslow, TW5 9QA

Building Type: **Warehouse**

Space Avail: **23,032 SF**

Star Rating: ★★☆☆☆

Max Contig: **23,032 SF**

Middlesex County

Building Status: **Built Apr 1990**

Smallest Space: **1,547 SF**

Building Size: **23,032 SF**

Rent/SF/Yr: **£3.50/tbd**

Land Area: -

% Leased: **0%**

Stories: 2

For Sale: **Not For Sale**



Landlord Rep: **Jones Lang LaSalle / Melinda Cross 020 8104 2001 -- 23,032 SF /3,156 ofc (1, 547-21,485 SF)**

Cranleigh Gardens Ind. Estate, Cranleigh Gdns, Southall, UB1 2BZ

AKA Cranleigh Gdns

Building Type: **Office/Industrial
Live/Work Unit**

Space Avail: **24,966 SF**
Max Contig: **10,200 SF**

Southall, UB1 2BZ

Star Rating: ★★☆☆☆

Smallest Space: **4,456 SF**

Middlesex County

Building Status: **Built Mar 1959**

Rent/SF/Yr: **£2.75 -
£5.00/tbd**

Building Size: **24,966 SF**

Typical Floor Size: **9,074 SF**

% Leased: **59.1%**

Stories: **2**

For Sale: **Not For Sale**



Landlord Rep: **Chamberlain Commercial / Tony Chamberlain 020 8429 6899 -- 10,200 SF (10,200 SF)**

Sublet Contact: **David Wilson / -- 18,364 SF (4,456-9,074 SF)**

Western Point, Glade Ln, Southall, UB2 4SE

Southall, UB2 4SE

Building Type: **Warehouse**

Space Avail: **28,750 SF**

Middlesex County

Star Rating: ★★☆☆☆

Max Contig: **28,750 SF**

Building Status: **Proposed**

Smallest Space: **28,750 SF**

Building Size: **98,380 SF**

Rent/SF/Yr: **£11.00/tbd**

Land Area: **1.60 AC**

% Leased: **70.8%**

Stories: **1**

Parking: **103 Surface Spaces are available; Ratio of
1.05/1,000 SF**

For Sale: **For Sale at £1,750,000 (£17.79/SF) - Under Offer**



Sales Company: **Jones Lang LaSalle: Gus Haslam 020 7087 5301**

Landlord Rep: **Jones Lang LaSalle / Gus Haslam 020 7087 5301 -- 28,750 SF (28,750 SF)**

Trade City Hayes, Hayes Rd, Southall, UB2 5XJ

AKA Hayes Rd

Building Type: **Warehouse**

Space Avail: **29,459 SF**

Southall, UB2 5XJ

Star Rating: ★★☆☆☆

Max Contig: **5,608 SF**

Building Status: **Built Jan 2014**

Smallest Space: **807 SF**

Building Size: **29,459 SF**

Rent/SF/Yr: **£11.95/tbd**

Land Area: **-**

% Leased: **0%**

Stories: **2**

For Sale: **Not For Sale**



Landlord Rep: **Cushman & Wakefield LLP / Karen Thomas 020 7152 5423
Heather Wood 020 7152 5324**

Leasing Company: **DTZ / -- 29,459 SF (807-4,682 SF)**

Western International Park, Hayes Rd, Southall, UB2 5XJ

AKA Hayes Rd

Building Type: **Distribution**

Space Avail: **5,598 SF**

Star Rating: ★★☆☆☆

Max Contig: **5,598 SF**

Southall, UB2 5XJ

Building Status: **Built Oct 2000**

Smallest Space: **2,799 SF**

Building Size: **120,222 SF**

Rent/SF/Yr: **£11.15/tbd**

Middlesex County

Land Area: -

% Leased: **100%**

Stories: 1

For Sale: **Not For Sale**



Landlord Rep: **Telsar Ltd / Bal Panesar 01895 819911**

Trade City Hayes, Hayes Rd, Southall, UB2 5XJ

AKA Hayes Rd

Building Type: **Warehouse**

Space Avail: **28,191 SF**

Star Rating: ★★☆☆☆

Max Contig: **9,720 SF**

Southall, UB2 5XJ

Building Status: **Built Jan 2014**

Smallest Space: **1,184 SF**

Building Size: **28,191 SF**

Rent/SF/Yr: **£11.95/tbd**

Middlesex County

Land Area: -

% Leased: **0%**

Stories: 2

For Sale: **Not For Sale**



Landlord Rep: **Cushman & Wakefield LLP / Karen Thomas 020 7152 5423**
Heather Wood 020 7152 5324

Leasing Company: **DTZ / -- 28,191 SF (1,184-9,720 SF)**

Heston Centre, International Ave, Hounslow, TW5 9NJ

AKA International Ave

Building Type: **Warehouse**

Space Avail: **12,645 SF**

Star Rating: ★★☆☆☆

Max Contig: **12,645 SF**

Hounslow, TW5 9NJ

Building Status: **Built Mar 1974**

Smallest Space: **1,546 SF**

Building Size: **55,255 SF**

Rent/SF/Yr: **£8.50/tbd**

Middlesex County

Land Area: -

% Leased: **77.1%**

Stories: 2

For Sale: **Not For Sale**



Landlord Rep: **Doherty Baines Property Consultants Ltd / Paul Londra 020 7355 3033**

Leasing Company: **De Souza & Co / -- 12,645 SF /3,044 ofc (1,546-11,099 SF)**

Westlands 3, Millington Rd, Hayes, UB3 4AZ

AKA Station Rd

Building Type: **Warehouse**

Space Avail: **76,628 SF**

Star Rating: ★★☆☆☆

Max Contig: **76,628 SF**

Hayes, UB3 4AZ

Building Status: **Proposed**

Smallest Space: **9,332 SF**

Middlesex County

Building Size: **76,628 SF**

Rent/SF/Yr: **£11.50/fri**

Land Area: -

% Leased: **0%**

Stories: **2**

Parking: **65 Surface Spaces are available**

For Sale: **Not For Sale**



Landlord Rep: **Jones Lang LaSalle / Melinda Cross 020 8104 2001**
Leasing Company: **Jones Lang LaSalle / -- 76,628 SF (9,332-67,296 SF)**

Bulls Bridge Distribution Centre, North Hyde Gdns, Hayes, UB3 4QR

Hayes, UB3 4QR

Building Type: **Warehouse**

Space Avail: **5,065 SF**

Star Rating: ★★☆☆☆

Max Contig: **5,065 SF**

Middlesex County

Building Status: **Built Apr 2006**

Smallest Space: **5,065 SF**

Building Size: **37,719 SF**

Rent/SF/Yr: **£10.79/tbd**

Land Area: -

% Leased: **100%**

Stories: **2**

For Sale: **Not For Sale**



Landlord Rep: *Company information unavailable at this time*

Pasadena Trading Estate, Pasadena Clos, Hayes, UB3 3NQ

AKA Pasadena Clos

Building Type: **Warehouse**

Space Avail: **6,720 SF**

Star Rating: ★★☆☆☆

Max Contig: **6,720 SF**

Hayes, UB3 3NQ

Building Status: **Built Sep 1983**

Smallest Space: **783 SF**

Building Size: **40,463 SF**

Rent/SF/Yr: **£4.50 -**

Middlesex County

Land Area: -

£9.00/tbd

Stories: **2**

% Leased: **83.4%**

For Sale: **Not For Sale**



Landlord Rep: **Telsar Ltd / Bal Panesar 01895 819911 -- 6,720 SF (783-5,937 SF)**

Unit 166, Pasadena Clos, Hayes, UB3 3NQ

Hayes, UB3 3NQ
Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built Dec 1984**
Building Size: **5,059 SF**
Land Area: -
Stories: **1**
Parking: **7 Surface Spaces are available; Ratio of 1.38/1,000 SF**
For Sale: **Not For Sale**

Space Avail: **5,059 SF**
Max Contig: **5,059 SF**
Smallest Space: **5,059 SF**
Rent/SF/Yr: **£10.50/tbd**
% Leased: **100%**



Landlord Rep: **Altus Edwin Hill / Andy Cole 01753 561805**
Natasha Ryan 01753 689000 -- 5,059 SF (5,059 SF)

Caxton Trading Estate, Printing House Ln, Hayes, UB3 1BE

Hayes, UB3 1BE
Middlesex County

Building Type: **Warehouse**
Star Rating: ★★☆☆☆
Building Status: **Built Aug 1984**
Building Size: **71,223 SF**
Land Area: -
Stories: **2**
Expenses: **2012 Tax @ £4.21/sf**
For Sale: **For Sale - Available**

Space Avail: **59,187 SF**
Max Contig: **59,187 SF**
Smallest Space: **2,604 SF**
Rent/SF/Yr: **Withheld**
% Leased: **100%**



Sales Company: **Colliers International: Akhtar Alibhai 020 7344 6583**
Landlord Rep: **Colliers International / Akhtar Alibhai 020 7344 6583**
Leonard Rosso 020 7487 1765 -- 59,187 SF (2,604-50,415 SF)

Argent Centre, Pump Ln, Hayes, UB3 3NB

AKA Pump Rd
Hayes, UB3 3NB
Middlesex County

Building Type: **Showroom**
Star Rating: ★★☆☆☆
Building Status: **Built Apr 1975**
Building Size: **38,477 SF**
Land Area: -
Stories: **2**
For Sale: **Not For Sale**

Space Avail: **20,355 SF**
Max Contig: **10,987 SF**
Smallest Space: **9,368 SF**
Rent/SF/Yr: **£9.75/fri**
% Leased: **100%**



Landlord Rep: **Capita Property & Infrastructure Ltd / Andrew Smith 020 7544 2000 -- 20,355 SF (9,368-10,987 SF)**

Argent Centre, Pump Ln, Hayes, UB3 3BL

AKA Pump Ln

Building Type: **Warehouse**

Space Avail: **16,034 SF**

Star Rating: ★★☆☆☆

Max Contig: **16,034 SF**

Hayes, UB3 3BL

Building Status: **Built Dec 1973**

Smallest Space: **5,860 SF**

Building Size: **27,234 SF**

Rent/SF/Yr: **£9.75/fri**

Middlesex County

Land Area: -

% Leased: **41.1%**

Stories: **2**

Parking: **38 Surface Spaces are available; Ratio of 1.40/1,000 SF**

For Sale: **Not For Sale**



Landlord Rep: **Capita Property & Infrastructure Ltd / Andrew Smith 020 7544 2000 -- 16,034 SF /3,835 ofc (5,860-10,174 SF)**

Craufurd Industrial Estate, Silverdale Rd, Hayes, UB3 3BN

AKA Silverdale Rd

Building Type: **Warehouse**

Space Avail: **6,400 SF**

Star Rating: ★★☆☆☆

Max Contig: **6,400 SF**

Hayes, UB3 3BN

Building Status: **Built Jun 1975**

Smallest Space: **6,400 SF**

Building Size: **7,450 SF**

Rent/SF/Yr: **£4.70/fri**

Middlesex County

Land Area: -

% Leased: **100%**

Stories: **1**

Parking: **5 Surface Spaces are available; Ratio of 0.67/1,000 SF**

For Sale: **Not For Sale**



Landlord Rep: **Diamond Associates / Gary Diamond 07768 353540 -- 6,400 SF /1,050 ofc (6,400 SF)**

Silverdale Industrial Estate, Silverdale Rd, Hayes, UB3 3BL

AKA Silverdale Rd

Building Type: **Warehouse**

Space Avail: **33,058 SF**

Star Rating: ★★☆☆☆

Max Contig: **33,058 SF**

Hayes, UB3 3BL

Building Status: **Built Nov 1973**

Smallest Space: **918 SF**

Building Size: **62,440 SF**

Rent/SF/Yr: **£7.35**

Middlesex County

Land Area: -

% Leased: **100%**

Stories: **2**

For Sale: **Not For Sale**



Landlord Rep: **Colliers International / Patrick Rosso 01895 457714**
Leasing Company: **Telsar Ltd / -- 16,737 SF /1,835 ofc (918-15,819 SF)**

Crauford Business Park, Silverdale Rd, Hayes, UB3 3BN

AKA Silverdale Rd

Building Type: **Warehouse**

Space Avail: **5,030 SF**

Star Rating: ★★☆☆☆

Max Contig: **5,030 SF**

Hayes, UB3 3BN

Building Status: **Built Apr 1987**

Smallest Space: **315 SF**

Middlesex County

Building Size: **10,137 SF**

Rent/SF/Yr: **£7.16/tbd**

Land Area: -

% Leased: **100%**

Stories: 1

For Sale: **Not For Sale**



Landlord Rep: **Colliers International / Patrick Rosso 01895 457714**

Trinity Trading Estate, Silverdale Rd, Hayes, UB3 3BN

AKA Silverdale Rd

Building Type: **Distribution**

Space Avail: **14,230 SF**

Star Rating: ★★☆☆☆

Max Contig: **14,230 SF**

Hayes, UB3 3BN

Building Status: **Built Aug 1992**

Smallest Space: **2,794 SF**

Middlesex County

Building Size: **17,024 SF**

Rent/SF/Yr: **Withheld**

Land Area: -

% Leased: **100%**

Stories: 1

For Sale: **Not For Sale**



Landlord Rep: **Savills (UK) Limited / Jack Booth 020 7499 8644**

Airlinks Industrial Estate, Spitfire Way, Hounslow, TW5 9NR

Hounslow, TW5 9NR

Building Type: **Warehouse**

Space Avail: **19,744 SF**

Star Rating: ★★☆☆☆

Max Contig: **19,744 SF**

Middlesex County

Building Status: **Built Sep 1985**

Smallest Space: **19,744 SF**

Building Size: **19,744 SF**

Rent/SF/Yr: **Withheld**

Land Area: -

% Leased: **100%**

Stories: 2

For Sale: **Not For Sale**



Landlord Rep: **Doherty Baines Property Consultants Ltd / Paul Londra 020 7355 3033
David O'Donovan 020 7355 3033 -- 19,744 SF /1,844 ofc (19,744 SF)**

Phase 2, Stockley Clos, West Drayton, UB7 9BL

AKA Stockley Clos

Building Type: **Industrial**

Space Avail: **56,371 SF**

Star Rating: ★★☆☆☆

Max Contig: **59,823 SF**

West Drayton, UB7 9BL

Building Status: **Proposed**

Smallest Space: **1,140 SF**

Building Size: **56,373 SF**

Rent/SF/Yr: **Withheld**

Middlesex County

Land Area: -

% Leased: **0%**

Stories: **2**

For Sale: **Not For Sale**



Landlord Rep: **Savills (UK) Limited / Bonnie Minshull 020 7409 8088 -- 56,371 SF (1,140-28,717 SF)**

Waterway Park, Swallowfield Way, Hayes, UB3 1AW

AKA Swallowfield Way

Building Type: **Warehouse**

Space Avail: **24,418 SF**

Star Rating: ★★☆☆☆

Max Contig: **14,795 SF**

Hayes, UB3 1AW

Building Status: **Built Oct 2006**

Smallest Space: **2,141 SF**

Building Size: **38,759 SF**

Rent/SF/Yr: **£9.50 - £10.00**

Middlesex County

Land Area: -

% Leased: **61.8%**

Stories: **1**

For Sale: **Not For Sale**



Landlord Rep: **Strutt & Parker / Ben Wiley 020 7318 5054 -- 14,795 SF (2,141-12,654 SF)**

Waterway Park, Swallowfield Way, Hayes, UB3 1EY

AKA Swallowfield Way

Building Type: **Warehouse**

Space Avail: **33,840 SF**

Star Rating: ★★☆☆☆

Max Contig: **21,140 SF**

Hayes, UB3 1EY

Building Status: **Built Feb 2006**

Smallest Space: **3,110 SF**

Building Size: **69,099 SF**

Rent/SF/Yr: **£10.00/fri**

Middlesex County

Land Area: -

% Leased: **51.0%**

Stories: **2**

Parking: **49 Surface Spaces are available; Ratio of 0.71/1,000 SF**

For Sale: **Not For Sale**



Landlord Rep: **Strutt & Parker / Nick Hardie 020 7318 5048 -- 33,840 SF /3,110 ofc (3,110-18,030 SF)**

Swallowfield Centre, Swallowfield Way, Hayes, UB3 1DQ

AKA Swallowfield Way

Building Type: **Warehouse**

Space Avail: **6,562 SF**

Star Rating: ★★☆☆☆

Max Contig: **5,383 SF**

Hayes, UB3 1DQ

Building Status: **Built Oct 1998**

Smallest Space: **1,179 SF**

Building Size: **24,110 SF**

Rent/SF/Yr: **£10.00/fri**

Middlesex County

Land Area: -

% Leased: **72.8%**

Stories: **2**

For Sale: **Not For Sale**



Landlord Rep: **Smith Young Real Estate / Jody Smith 020 3327 2370 -- 6,562 SF (1,179-5,383 SF)**

Swallowfield Way Ind. Estate, Swallowfield Way, Hayes, UB3 1DQ

AKA Swallowfield Way

Building Type: **Warehouse**

Space Avail: **62,746 SF**

Star Rating: ★★☆☆☆

Max Contig: **41,854 SF**

Hayes, UB3 1DQ

Building Status: **Built Jan 1974**

Smallest Space: **20,892 SF**

Building Size: **128,923 SF**

Rent/SF/Yr: **£7.50/tbd**

Middlesex County

Land Area: -

% Leased: **51.3%**

Stories: **2**

Parking: **167 Surface Spaces are available; Ratio of 1.30/1,000 SF**

For Sale: **Not For Sale**



Landlord Rep: **Colliers International / Akhtar Alibhai 020 7344 6583**

Leasing Company: **Jones Lang LaSalle / -- 62,746 SF /7,149 ofc (20,892-20,954 SF)**

64A The Green, Southall, UB2 4BG

Southall, UB2 4BG

Building Type: **Warehouse**

Space Avail: **12,742 SF**

Star Rating: ★★☆☆☆

Max Contig: **12,742 SF**

Middlesex County

Building Status: **Built Jan 1951**

Smallest Space: **12,742 SF**

Building Size: **12,742 SF**

Rent/SF/Yr: **£4.71/tbd**

Land Area: **0.50 AC**

% Leased: **0%**

Stories: **1**

For Sale: **Not For Sale**



Landlord Rep: **Telsar Ltd / Bal Panesar 01895 819911
Dipesh Patel 01895 819910 -- 12,742 SF (12,742 SF)**

Clayton Business Centre, Trevor Rd, Hayes, UB3 1RT

AKA Trevor Rd

Building Type: **Warehouse**

Space Avail: **9,715 SF**

Star Rating: ★★☆☆☆

Max Contig: **9,715 SF**

Hayes, UB3 1RT

Building Status: **Built Dec 2005**

Smallest Space: **826 SF**

Building Size: **15,030 SF**

Rent/SF/Yr: **£10.50/fri**

Middlesex County

Land Area: -

% Leased: **35.4%**

Stories: 1

For Sale: **Not For Sale**



Landlord Rep: **Altus Edwin Hill / Andy Cole 01753 561805**

Leasing Company: **Cushman & Wakefield LLP / -- 9,715 SF /2,034 ofc (826-7,681 SF)**

Clayton Business Centre, Trevor Rd, Hayes, UB3 1RZ

AKA Clayton Rd

Building Type: **Warehouse**

Space Avail: **6,900 SF**

Star Rating: ★★☆☆☆

Max Contig: **6,900 SF**

Hayes, UB3 1RZ

Building Status: **Built May 2003**

Smallest Space: **6,900 SF**

Building Size: **6,908 SF**

Rent/SF/Yr: **Withheld**

Middlesex County

Land Area: -

% Leased: **100%**

Stories: 1

Parking: **10 Surface Spaces are available; Ratio of 1.45/1,000 SF**

For Sale: **Not For Sale**



Landlord Rep: **Altus Edwin Hill / Andy Cole 01753 561805**

Leasing Company: **Cushman & Wakefield LLP / -- 6,900 SF (6,900 SF)**

International Trading Estate, 4-5 Trident Way, Southall, UB2 5LF

AKA 5 Trident Way

Building Type: **Warehouse**

Space Avail: **55,001 SF**

Star Rating: ★★☆☆☆

Max Contig: **55,001 SF**

Southall, UB2 5LF

Building Status: **Built May 1972**

Smallest Space: **5,091 SF**

Building Size: **115,428 SF**

Rent/SF/Yr: **£5.50/tbd**

Middlesex County

Land Area: -

% Leased: **52.4%**

Stories: 2

For Sale: **Not For Sale**



Landlord Rep: **Telsar Ltd / Bal Panesar 01895 819911 -- 55,001 SF (5,091-49,910 SF)**

Unit 1, Uxbridge Rd, Hayes, UB4 0JU

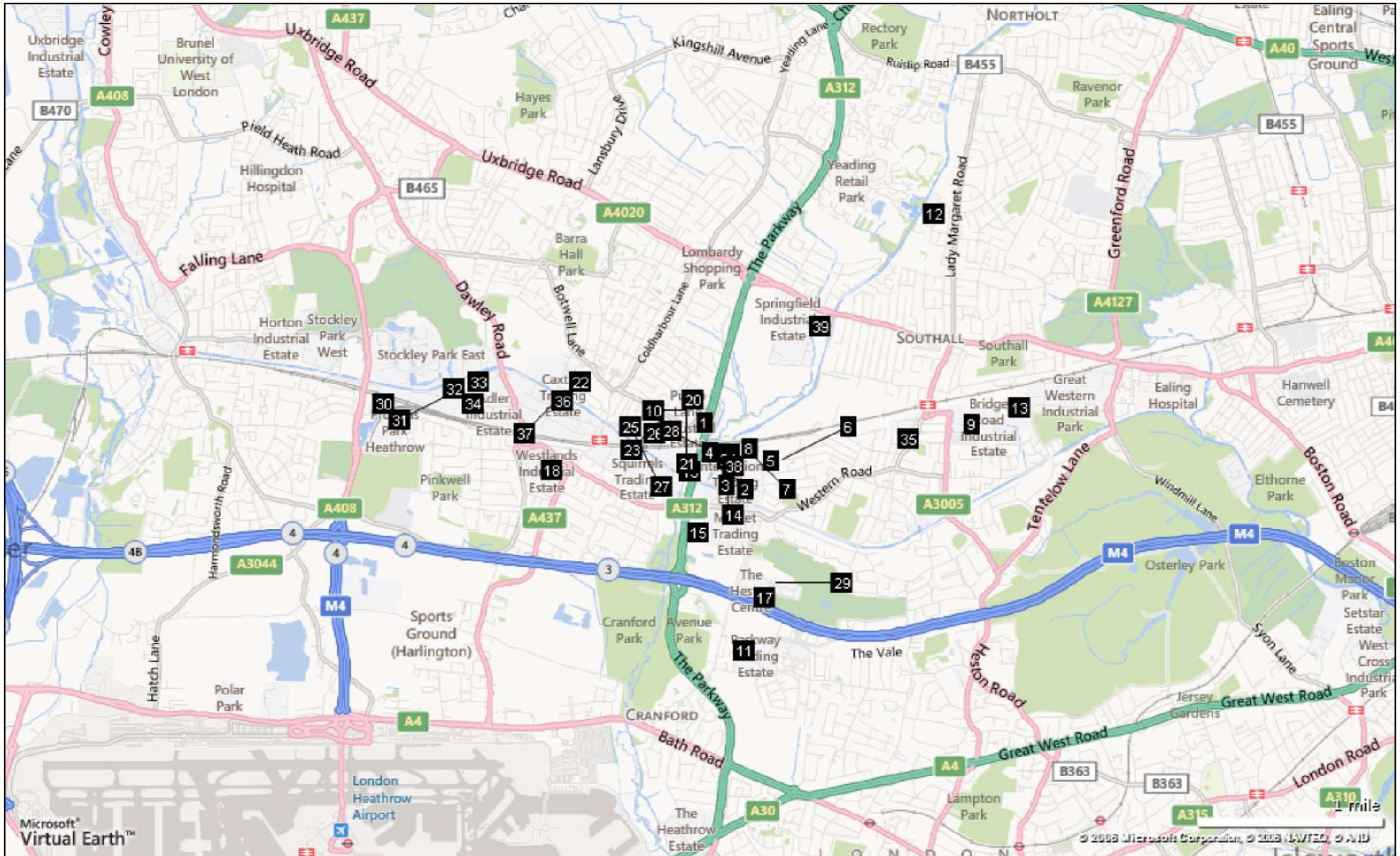
Hayes, UB4 0JU
Middlesex County

Building Type: **Industrial**
Star Rating: ★★★★★
Building Status: **Proposed**
Building Size: **27,705 SF**
Land Area: -
Stories: **1**
Parking: **22 Surface Spaces are available**
For Sale: **Not For Sale**

Space Avail: **27,705 SF**
Max Contig: **27,705 SF**
Smallest Space: **27,705 SF**
Rent/SF/Yr: **Withheld**
% Leased: **0%**



Landlord Rep: **Jones Lang LaSalle / Bridget Outtrim 020 8283 2537**
Leasing Company: **Doherty Baines Property Consultants Ltd / -- 27,705 SF /3,165 ofc (27,705 SF)**



Appendix 2

Amended Draft Policy SA18 and SEA1

POLICY SA 18: Chailey Industrial Estate and Argent Centre, Pump Lane

The Chailey site is currently vacant and provides an opportunity for mixed use development to enhance Hayes town centre. The Argent has vacant units along Pump Lane which have been vacant for a considerable period of time. These units with frontage on Pump Lane along with Chailey Industrial Estate provides an opportunity for mixed use development to enhance Hayes town centre.

The following development principles will apply:

- Site A - Up to 50% of the site should be released for residential development at a development density of 110 units per hectares,
- Site B - The Council will require 40% of the site to be used for employment generating uses;
- Site C – The units fronting Pump Lane are available for a mix of retail and employment uses;
- The Council will seek to achieve a proportion of community infrastructure on the site to assist in the regeneration of Hayes;
- Proposals should be provided to a high quality design;
- Open space and amenity space should be provided in accordance with Council standards; and
- Proposals should meet the provisions of relevant policies in other parts of the Local Plan.

Policy SEA 1: Strategic Industrial Locations

In accordance with policy 2.17 of the London Plan the Council will promote, manage where appropriate protect a network of Strategic Industrial Locations across the borough. The following are designated as Preferred Industrial Locations (PILs).

- **Hayes Industrial Area**, defined by the areas shown on Map A located near Hayes town centre (excluding the Argent Centre), on Map B located off Springfield Road to the east of the Minet Country Park.
- **Uxbridge Industrial Estate**, defined as the area shown on Map C.
- **Stonefield Way Industrial Estate**, as defined by the area shown on Map D The following area is designated as an Industrial Business Park (IBP):
- **North Uxbridge Industrial Area**, as defined by the area shown on Map E.

Development in these areas will be required to meet the provisions of draft policy DME1 in the Council's Development Management Policies, and policy 2.17 of The London Plan.



Phase 2

PLANNING &
DEVELOPMENT
LIMITED



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address			
Title			
First name			
Last Name			
Organisation (if relevant)			
Unit		House number	
House name			
Address 1			
Address 2			
Town			
County			
Postcode			
Telephone			
Email			

2. Agent's Name and Address (if applicable)	
Title	Mr
First name	Michael
Last name	Calder
Company	Phase 2 Planning and Development Ltd
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input type="checkbox"/>	Development Management Policies
<input checked="" type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	POLICY SA 18:
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared
<input type="checkbox"/>	It is not justified

<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

See attached submissions

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

See attached submissions

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To explore fully the evidence base and the LPAs decision making

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

Please continue on a separate sheet if necessary

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Monitoring Questions

The London Borough of Hillingdon is committed to provide a fair and equal service delivery. To assist us in this process we kindly request that you complete the monitoring information below. The information will be treated in confidence and will be used for monitoring purposes only.

1) What is your gender?

Male Female

2) To which age group do you belong?

under 15 25 – 44 65 – 85
 15 - 24 45 - 64 85+

3) Do you consider yourself to be a disabled person?

No Yes

4) How would you describe your ethnic origin? You may wish to use one of the following categories (please tick and add additional detail if you wish to do so):

a) <input type="checkbox"/> White	d) <input type="checkbox"/> European background
b) <input type="checkbox"/> Asian or Asian British	e) <input type="checkbox"/> Mixed Group
c) <input type="checkbox"/> Black or Black British	f) <input type="checkbox"/> Other ethnic group



HILLINGDON

LONDON

Local Plan Part 2 Regulation 19 Proposed Submission Version Representation Form

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address		2. Agent's Name and Address (if applicable)		
Title	Miss	Title	N/A.	
First name	Jane	First name		
Last Name	Wilkin	Last name		
Organisation (if relevant)	Environment Agency	Company		
Unit		Unit	House number	
House name		House name		
Address 1		Address 1		
Address 2		Address 2		
Town		Town		
County		County		
Postcode		Postcode		
Telephone		Telephone		
Email		Email		

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI5
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We support paragraph 6.19 and the policy which aims to protect existing green chains (which include river corridors) and recognizing the potential to improve biodiversity.

The policy could be stronger by requiring that developments not only reinforce the linkages between existing green chains but also create new green infrastructure wherever possible to provide new areas of habitat and amenity space for people. New areas of green infrastructure should be a requirement especially in areas where green chains are deficient.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. *(It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)*

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2		Technical Reports (answer Q1 & Q9 only)	
<input checked="" type="checkbox"/>	Development Management Policies	<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Site Allocations and Designations	<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Policies Map (Atlas of Changes)	<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI8
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Although we find this policy sound, we feel that the policy would be more effective if some of the supporting text to the policy was contained within the policy itself. See response in Q6 for suggested changes.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

We welcome the reference to the Thames River Basin Management Plan and other relevant Catchment Management Plans, however, we thought that the emphasis on 'developments should have regard to the provisions' should be stronger. It is the Local Authority that should have regard to the provisions of the plan and ensure the evidence and objectives underpin planning policies. The Waterside Development Policy offers the opportunity to set out the main principles that applicants need to achieve when proposing developments alongside watercourses in Hillingdon. The policy doesn't clearly set this out in its current form or differ greatly from strategic Policy EM3: Blue Ribbon Network.

We are pleased to see specific requirements developments are expected to achieve in paragraph 6.31 (8 metre buffer strip from top of bank for main river, 5 metres for ordinary watercourse, or an appropriate width as agreed by the Council). However, we recommend these are included within Policy DME18 rather than the supporting text to ensure this requirement has policy backing and applicants are in no doubt that this is what they should aim to achieve alongside waterways. We also recommend the policy requires developments to (wherever feasible) restore and naturalise rivers in accordance with the actions proposed within the Thames River Basin Management Plan, and that S106 contributions may be sought to achieve this if restoration cannot be achieved on site. For an example of a policy with similar aspirations please see Harrow's Development Management Policy DM11 (Protection and Enhancement of River Corridors and Watercourses). We also strongly recommend the policy highlights the importance of incorporating Sustainable Drainage Features alongside waterways to improve the water quality and slow down drainage runoff.

We welcome the reference to expecting development to contribute to improvements to biodiversity improvements to the canal in the last paragraph. We recommend this is extended to all types of watercourse and highlight the use of native planting and the removal of non-native species and to minimise light spill on waterside corridors.

The State of the Environment Report for Hillingdon (2013) states that whilst the major rivers within the borough provide on average good quality fisheries, the tributaries of the Colne and Crane continue to suffer from poor quality fisheries habitat and incidents of poor water quality. The policy should include specific

aspirations from proposed developments along these tributaries including the resolution of misconnections.

The supporting text paragraph 6.27 could acknowledge that the next Thames RBMP which will detail the site-specific measures required to achieve good status or potential in rivers will be made available in 2014 (consultation due this autumn). Developments will be expected to deliver these actions/mitigation measures where they encroach onto/impact a watercourse channel or corridor.

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME10
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

This policy should be stronger by providing further details of expectations of developments, particularly in ensuring that the policy is supported by the evidence bases (e.g. SFRA and SWMP). The policy recommendations and development principles from the SFRA and SWMP should directly inform this policy so it is clear what developments in flood risk areas should be achieving to reduce the risk of flooding.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Although strategic policy EM6 clearly sets out a sequential approach, this is not then reflected in proposed policy DME110. We recommend that the wording is amended to reflect the fact that sites within Flood Zones 2, 3a and 3b will be required to pass the sequential test before submitting a Flood Risk Assessment. We would also recommend that where sites are located in Flood Zones 2, 3a or 3b and the sequential test has been passed, that the policy requires development to be planned using a sequential approach within the site so that more vulnerable developments are placed in the least risky areas of the site. You should also consider how windfall sites, not included in the site allocations, will be sequentially tested to ensure that development is directed towards sites with lower risk of flooding.

It is positive that you wish to place strict controls to manage surface water on sites where the SWMP has identified Critical Drainage Areas. We suggest that there is some additional supporting text to make it clear that the LLFA will be responsible for assessing flood risk in critical drainage areas. You should also consider is the application of the sequential test for sites in critical drainage areas if you wish to treat them as flood zone 3.

It is unclear in what type of scenario it is envisaged that developments may make contributions in addressing surface water flood risk and would be grateful if you could provide further clarification on this aspect of the policy.

The policy does not include any reference to adaptation and mitigation for climate change. We recommend that the policy requires development to minimise the vulnerability of the development to flood risks through design and layout. In addition flood storage areas should be protected and provided for wherever possible.

Where development is proposed next to flood defences we expect the applicant to demonstrate that the defence would be adequate for the lifetime of the development and where required that they are replaced or repaired to ensure this is the case.

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input type="checkbox"/>	No, I do not want to participate in the oral examination
<input checked="" type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

If you consider that the above changes can be made prior to the examination we are happy not to participate in the examination. If the inspector would like to ask questions regarding our comments we are happy to attend the examination if the changes have not been taken forward.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

We are satisfied that an addendum to the SFRA has been carried out using the most up to date data and that the sequential test has been undertaken appropriately.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2		Technical Reports (answer Q1 & Q9 only)	
<input checked="" type="checkbox"/>	Development Management Policies	<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Site Allocations and Designations	<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Policies Map (Atlas of Changes)	<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI11
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

This policy has very strong requirements for the use of SuDS and it is positive that policy 5.13 of the London Plan has been used as a framework for demonstrating an appropriate SuDS system which we support.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

All major new build developments are expected to achieve Greenfield including climate change allowance which is positive. You may wish to consider if the same standard should be applied to all development within critical drainage areas (with exception of minor/household development) depending on the recommendations of your SWMP. If paving over front/back gardens is an issue in Hillingdon you may wish to liaise with Newham who are looking at this issue and drafting up a policy approach. To ensure the most sustainable selection of SuDS for each development you may also wish to encourage developments incorporate multiple SuDS to form a SuDS train and or select SuDS which provide multiple benefits including water quality, flood risk, biodiversity and amenity.

You may wish to consider whether the approach set out will be feasible for sites which are unable to infiltrate or where there are high levels of contamination.

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DME112
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

We are pleased to see a commitment to improving water quality through development and the supporting text indicates that the policy has been designed to address the issue of phosphates. There is no information within the supporting text to indicate where the targets are derived and we have reservations that the use of SuDS alone may not be applicable in addressing all of the targets identified. The main sources of phosphorus in rivers and lakes are sewage effluent (such as misconnections, use of septic tanks and sewage treatment plants) and agricultural drainage. Requiring developers to use SuDS will contribute to improving water quality associated with urban diffuse pollution, which we would encourage the promotion of, but is unlikely to have contributed significantly in the reduction of phosphates.

There are no standards for measuring the parameters identified and it is not easy to quantify water quality benefits. We have concerns that it could be very onerous for applicants to demonstrate the requirements set out in the policy. It also does not state what evidence applicants are expected to provide or who would be responsible for assessing this. Even if there was an agreed way of measuring the parameters which have been identified, there are still a number of factors which could affect the measurements obtained such as type of development proposed, weather, seasonal variations, and one-off pollution incidents.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

We suggest that the policy is altered to remove the load reduction targets and instead encourages developers to incorporate a robust SuDS management train to address the issues of urban diffuse pollution. This would be supported by paragraph 006 of the NPPG which steers local plans to set out expectations for protecting groundwater and sustainable drainage systems 'Controlling surface water through sustainable drainage systems can improve water quality, speed up replenishment of groundwater, reduce flood risk and improve the environment.'

To address the issues of phosphates the policy could also look at measures to address misconnections and ensuring that sewage is dealt with appropriately (e.g. location of septic tanks). Paragraph 16 of the NPPG (reference ID 34-016-20140306) requires applicants to assess impacts of proposed development on water quality where there is a potential impact on the waterbody in the River Basin Management Plan and how they propose to mitigate the impacts. This information could be sought in a development management policy by expecting applicants to submit a Water Framework Directive Assessment or as part of an Environmental Statement. Paragraph 16 states:

When a detailed assessment is needed, the components are likely to include:

- *the likely impacts of the proposed development (including physical modifications) on water quantity and flow, river continuity and groundwater connectivity, and biological elements (flora and fauna).*
- *how the proposed development will affect measures in the river basin management plan to achieve good status in water bodies.*
- *how it is intended the development will comply with other relevant regulatory requirements relating to the water environment (such as those relating to bathing waters, shellfish waters, freshwater fish and drinking water) bearing in mind compliance will be secured through the Environment Agency's permitting responsibilities.*

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

PART B - Your responses:

Please complete Part B for each representation you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMEI17
Paragraph Number; or	
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input type="checkbox"/>	It has not been positively prepared	<input type="checkbox"/>	It is not effective
<input type="checkbox"/>	It is not justified	<input type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.
(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

The policy itself does not explicitly outline what a developer is expected to submit as part of an application on a site where contamination is known or suspected. National Planning Practice Guide paragraph 005 states that Local Plans should be clear on the role of developers and requirements for information and assessments in considering land contamination. Sites will be expected to submit a preliminary risk assessment/desktop study with their planning applications to assess if land contamination may be present at the site, including information on past and current uses and sensitive controlled waters receptors, in line with paragraph 007 of the National Planning Practice Guide.

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

The policy should also encourage the re-use of brownfield sites to ensure remediation where necessary and to prevent development from being adversely affected by the presence of unacceptable levels of soil pollution. Further context for this section can also be derived from our Groundwater protection: principles and practice (GP3) document. Our GP3 document describes how we manage and protect groundwater, both now and for the future; it highlights the importance of groundwater and encourages industry and other organisations to act responsibly and improve their practices.

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? (Please tick appropriate box)

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

Q9 If you are commenting on the accompanying technical reports (Sustainability Appraisal, Consultation Statement and, Addendum to the Strategic Flood Risk Assessment and Sequential Test), please provide your comments below.

~~1014~~
ID14, rep 2



HILLINGDON
LONDON

**Local Plan Part 2
Regulation 19 Proposed Submission Version
Representation Form**

Please read the **Guidance Note** for an explanation of how to complete the form and, the **Statement of Representations Procedure** for details on where to view the Local Plan Part 2 and its associated documents. Forms must be received by the Council by **5pm Tuesday 4th November 2014**.

PART A - Your Details (must be completed)

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the draft Local Plan Part 2 is submitted for examination. Copies of representations **cannot be treated as confidential** however personal contact details will be removed from representations published electronically.

1. Name and Address		
Title		
First name		
Last Name		
Organisation (if relevant)	BRITISH SIGN & GRAPHICS ASSOCIATION	
Unit	House number	
House name		
Address 1		
Address 2		
Town		
County		
Postcode		
Telephone		
Email		

c/o AGENT

2. Agent's Name and Address (if applicable)	
Title	MR
First name	CHRIS
Last name	THOMAS
Company	CHRIS THOMAS LTD
Unit	
House name	
Address 1	
Address 2	
Town	
County	
Postcode	
Telephone	
Email	

PART B - Your responses:

Please complete Part B **for each representation** you wish to make. You do not need to complete Part A and C again.

Q1. I am commenting on:
(please tick relevant box)

Local Plan Part 2	
<input checked="" type="checkbox"/>	Development Management Policies
<input type="checkbox"/>	Site Allocations and Designations
<input type="checkbox"/>	Policies Map (Atlas of Changes)

Technical Reports (answer Q1 & Q9 only)	
<input type="checkbox"/>	Sustainability Appraisal pre-submission version
<input type="checkbox"/>	Consultation statement
<input type="checkbox"/>	Addendum to the Strategic Flood Risk Assessment and Sequential Test

Q2. To which part of the document does this representation relate?

Policy Number; or	DMTC 5 (E) & (F) DMHB 14(C)
Paragraph Number; or	3.34 5.52 5.56
Table or Figure Number; or	
Map Number (Atlas of Changes)	

Q3. Do you consider that the Local Plan Part 2 is: (please tick)

	Yes	No
Sound?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prepared in accordance with the duty to cooperate, legal and procedural requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Q4. If you consider the Local Plan Part 2 to be unsound, indicate your reasons below (Tick relevant box/es)

<input checked="" type="checkbox"/>	It has not been positively prepared	<input checked="" type="checkbox"/>	It is not effective
<input checked="" type="checkbox"/>	It is not justified	<input checked="" type="checkbox"/>	It is not consistent with National policy

Q5. Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate.

(Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

SEE ATTACHED LETTER

Please continue on a separate sheet if necessary

Q6. Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to cooperate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

SEE ATTACHED LETTER

Please continue on a separate sheet if necessary

Q7. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination? *(Please tick appropriate box)*

<input checked="" type="checkbox"/>	No, I do not want to participate in the oral examination
<input type="checkbox"/>	Yes, I would like to participate in the oral examination

Q.8 If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

PART C - Information on the progress of the Local Plan Part 2

If you would like to be updated on the progress of the draft Plan, please indicate (*tick*) which stage(s) of the Plan that you would like to be informed of:

<input checked="" type="checkbox"/>	When the Local Plan Part 2 Plan has been submitted for independent examination
<input checked="" type="checkbox"/>	The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
<input checked="" type="checkbox"/>	The adoption of the Local Plan Part 2

Returning your form

Completed representation forms may be returned to the Planning Policy Team by either:

- **Email to:** localplan@hillingdon.gov.uk
- **By post to:** Planning Policy Team, London Borough of Hillingdon 3N/02 Civic Centre, High Street, Uxbridge, Middlesex UB8 1UW.

For more details: Please telephone the Planning Policy Team on 01895 250 230 or send an email to: localplan@hillingdon.gov.uk

All forms must be received by the Council by 5pm 4th November 2014.

Chris Thomas Ltd
Outdoor Advertising Consultants

The Planning Policy Team
London Borough of Hillingdon Council
3/N02 Civic Centre
High Street
Uxbridge
Middlesex UB8 1UW

26 September 2014

Dear Sir/Madam,

London Borough of Hillingdon Local Plan Part 2, Development Management Policies Publication Draft, September 2014

These representations are submitted on behalf of the British Sign and Graphics Association (BSGA) in response to Policies DMTC5, DMHB14 and supporting text.

The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure that emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).

The BSGA would firstly point out that, in line with section 3 of the PPG, a local plan does not have to contain advertisement control policies; and that, if such policies are considered necessary to protect the unique character of a particular area, these should be evidence based.

We would point out that Polices DMTC5 and DMHB14 and their respective supporting text are terribly muddled and confusing. Policy DMTC5 states that it gives advice on "Shopfronts"; yet it also gives advice on advertisements. Policy DMHB14 states that it concerns "Streets and Public Realm"; yet it also contains advice on shopfronts and advertisements. Supporting text 5.52 - 5.56 jump around between shopfronts and advertisements with absolutely no cohesive pattern. This is incredibly misleading for readers. Having looked at DMTC5 and found advice on shopfronts and advertisements, why should they also need to look elsewhere (and why would they look at "Streets and Public Realm")? There is no indication that this policy might be relevant to shopfronts and advertisements.

We suggest that the various relevant parts of these two policies and their supporting text be combined, abbreviated and improved into a single (or two) comprehensive policies concerning "Shopfronts" and "Advertisements".

As to detailed comment:

Para 3.34 correctly identifies that poorly designed and sited shop signs can have an adverse impact on the character of an area. However, this provides no evidential support for Policy DMTC(E) and (F). Shop signs do not need to be restricted in number or to certain areas of a shopfront - each proposal must be considered on individual merit (and size, position on the building and design, illumination and clutter will be relevant considerations, exactly as within Policy DMHB14(C)). The advice that shop sign content will be restricted to the shop name is contrary to the Regulations, as advised in PPG Section 4 (see advice on "necessity"). As to Policy DMTC(F), we agree that illumination to shopfronts should avoid light pollution and intrusion to nearby residents. But this does not justify the proposed ban on all flashing and internally illuminated "box lights". Again, each proposal must be considered on merit (and I do not for a second believe that there are no internally illuminated "box lights" displayed on bus shelters in the Borough with the Council's approval).

Para 5.52-5.56. Paras 5.52-53 concern advertisements; 5.54-5.55 concern shopfronts; 5.56 concern advertisements again. These should be re-ordered as we recommend above. As to detail, "advertisement proposals, includingetc" is unnecessary. All are "advertisements" within the statutory definition. Evidence taken from Inspector's Reports at Local Plan Inquiries at Mendip and Wandsworth support our objections. In the Mendip case the Inspector concluded that a similarly restrictive policy being put forward by the Council was not justified. I quote from paragraph 4.182 of the Inspector's Report:

"There is also no need to make special mention of poster hoardings. They clearly fall within the normal meaning of *advertisements* and, whilst they are the subject of specific guidance in the annex to PPG19 (now section 8 of the PPG), they are still subject to the same amenity and public safety tests contained in the Regulations as other outdoor advertising."

In the Wandsworth case the Inspector again dismissed the use of blanket policies that would restrict advertisements of certain types or locations. I quote from paragraph 3.145 below:

"The Regulations limit Council control of those advertisements which fall within their scope to the interests of amenity and public safety. There is, therefore, no support in them for a blanket policy to prevent advertisements near schools and playgrounds....It is clear that all applications should be considered on these two grounds on their own merits. For the same reason I cannot accept objection 319 which would not allow the number of hoarding sites to be increased."

So, whilst we accept that para 5.52 should quite properly draw attention to "proliferation", there is no justification for the proposed restrictions in the remainder of

the paragraph. How can free-standing advertisements be judged against a "fascia level" which does not exist? We also agree that high-level signs need to be carefully controlled; but there is no requirement for such signs to "make a positive contribution". The Regulations require that, provided an advertisement does not detract from amenity or public safety, it must be permitted.

Paras 5.53 and 5.56 both concern the same matters, eg heritage assets. They should be combined. The first sentence of paragraph 5.56 correctly identifies the matters to be considered (although "illuminated signs, lettering and" is superfluous - they are all "advertisements"). But this provides no justification for the proposed ban on "fully illuminated" fascia panels on listed buildings or in conservation areas. Many conservation areas (which very often include listed buildings) are thriving commercial areas where the full range of advertising on business premises is to be expected and welcomed, providing it does not detract from amenity. The last two sentences of para 5.56 partly contradict the first part of this paragraph. This means that the advice is confusing (and, again, totally unjustified, for the reasons we give above). For example, individually illuminated letters or "halo" illumination is actually "internal illumination" - it can be no other! Finally, external spotlights must project to cast light onto a background - how are they supposed to be "concealed"?

In Policy DMHB14(C), "and hoardings" is superfluous, as explained above. But, curiously, the remainder of this part of the policy is wholly acceptable and this is what should be reflected in the supporting text.

It is hoped that these comments are found to be useful and informative, if you have any further questions, please contact me.

Yours faithfully



Chris Thomas
Chris Thomas Ltd

Heine Planning Consultancy

Alison T Heine B.Sc, M.sc, MRTPI



By email:localplan@hillingdon.gov.uk

1 December 2014
L3-j67-09

Mr J Gleave, Ms Efua Dadze-Arthur
Local Plans Team
Planning Policy Team
LB Hillingdon Council
3N/02 Civic Centre
High St
Uxbridge UB8 1UW

Dear Sir/ Madam

**Re: Part 2 Local Plan
Site Allocations and Designations Proposed Submission
Paras 3.10-3.12 Gypsy and Traveller issues**

In response to my recent email I understand late representations will still be accepted in respect of the Part 2 Local Plan up until when the matter is reported to Cabinet. I wish to comment on the approach to Gypsy-Traveller issues. I do not consider that this is sound or policy compliant and I would want this drawn to the attention of the EIP Local Plan Inspector. If instructed I would wish to attend any session at the EIP when these matters are discussed. I do ask that I am kept informed of any further developments, especially the response of the Council to any issues that may be raised by the Planning Inspectorate.

I list below my concerns:

1. The September 2014 GTAA carried out by the Council is not robust and can not be relied on for the following reasons

-it was published late in the day in September 2014, just at the start of this final consultation exercise (22 September – 4 November). Its existence was not made known to those working for Travellers in the district. Indeed, the Council failed to even refer to this document until a few days before an appeal on 25 November 2014 despite several requests to agree a statement of common ground. I fear this has been slipped in at the last minute in the hope it was not noticed. Indeed, I am not clear when it was added to the Council evidence base.

-it appears to ignore the findings of two recent appeal decisions for New Years Green Lane and Jackets Lane where Inspectors were convinced there was a significant unmet need for more sites.

- It does not follow the methodology set out in the 2007 DCLG guidance. I do not understand how different population increases were assessed and over what time period. Para 6.6 implies the need has been assessed over the next 5 years and not the full plan period 2011-2026.

-it fails to include all known sites in the district. It would be helpful to list all known sites and explain why families living on what are presumed to be tolerated sites off Moorhall Road Harefield, New Years Green Lane and elsewhere are not included.

-it fails to consider the ethnic breakdown of all families with a need to reside in the district.

-Para 6.3 confirms that the study fails to include the needs of housed Travellers of which there are many, especially in the Harefield area. Para 4.7 GTAA admits that the majority of Travellers in the Borough probably live in housing. Para 5.5 would appear to suggest that from a small sample of families living in housing there is a preference for some to return to living in a caravan on a council owned site.

-there is no consideration of in-migration and the needs of families displaced from Hillingdon on account of the lack of sites.

-it appears to wrongly assumes a high turnover rate at Colne Park. I am told there was an incident which led to families leaving the site some 5 years ago and since then very few plots have changed hands. This would appear to be confirmed in para 5.6 of the 2014 GTAA . Para 5.2 GTAA 2014 notes that not one of the families interviewed at Colne Park intended to move. This would not suggest that much (if any) scope exists to meet need from turnover of plots on this site.

For the above reasons it can not be assumed the Council is best placed to assess the needs of Gypsies and Travellers in the Borough. The Council has a Traveller Forum. It is understood their views were not sought on the Local Plan part 2 until after the consultation period. It is not clear how their input has fed into the policy making process.

2. Based on recent appeal decisions it is not accepted that there is an additional need for just 3-4 pitches over the plan period. There is an immediate need for at least 4 pitches from the three appeals recently considered/ pending.

The Gypsy Council did its own quick check of the situation in late November 2014. On one afternoon Mr J Jones of the Bucks Floating support group of the Gypsy Council interviewed the occupants of 11 plots at Colne Park and identified an immediate need for 16 pitches from current overcrowding and household formation. This report was submitted at the appeal for Moorhall Road, Harefield on 25 November 2014. This suggests the need in Hillingdon is clearly far greater than just 3-4 pitches identified by the Council.

3. The Council accepts there is an immediate need for more pitches. It is not accepted that this identified need should all be accommodated at the existing Colne Park site for the following reasons

-this is not an objectively assessed appraisal. The Council has failed to consider the suitability of other sites. It is presumed no suitable sites can be found on Previously Developed Land in settlements boundaries or elsewhere. It is presumed no allocation is to be made as part of any housing scheme but this is not clear from the very brief consideration of this matter. Paras 3.10-3.12 of the Local Plan part 2 read very much as an afterthought thrown in at the last minute with little consideration of the issues and options. There is no consideration of suitable sites as promised in Part 1.

-Colne Park is a socially run site. It does not address the needs of those seeking to self provide. The Council is aware of the needs of families seeking private sites at New Years Green Lane, Moorhall Road Harefield and Jackets Lane. Not all families can afford socially provided sites which is why many prefer to self provide on land they own or can stop on without the worry of meeting expensive weekly rental rates.

-As noted in section 5 GTAA Key Findings, the majority of the residents at Colne Park are Irish Travellers. It would be difficult to integrate families of other ethnic backgrounds when the site is overwhelmingly taken by one ethnic group. Not all families seeking to reside in Hillingdon are Irish Travellers. The ethnic breakdown is not considered as part of the GTAA. This approach of expecting all families to live together on one site is not consistent with criteria (c) Policy H3 Part 1 Local Plan which states that proposals for sites will accommodate the specific needs of the different travelling groups.

-There are site issues with Colne Park. Para 4.6 of the GTAA states that the site was reduced in size from 30 to 21 to improve the site. It is unclear how it will be improved by adding extra plots. Saved Government guidance 2008 (para 4.7) is that the ideal site size is 15 pitches. Existing plots are small and cramped. There are drainage issues with the site. The site is located on the edge of a flood zone and the EA map suggests the access road is at risk of flooding. The Council's addendum Strategic FRA and Sequential Test July 2014 states that the site was previously partly within the flood plain but recent modelling concludes it is now in FRZ1. The EA flood maps appear suggest that the site access and approach road up into West Drayton is still at risk of flooding and reliant on flood defences.

- The site is located within the Green Belt. Expansion of this site would not be consistent with other relevant Local Plan policies as required by Policy H3 of the Local Plan Part 1. The Council has refused three other applications for private sites in the Green Belt because it is inappropriate development. It would be inconsistent of the Council to make an exception to Green Belt policy for its own site. It is unclear what exceptional circumstances the Council rely on accordance with Policy E of the Planning Policy for Traveller Sites (PPTS) which are not relied on to support private site provision in the same Green Belt. Expansion of Colne Park would remain inappropriate development and would not be approved except in very special circumstances. Two appeal decisions have already confirmed that the Very Special Circumstances to grant sites in the Green Belt do not exist in Hillingdon even where exceptional personal circumstances are relied on. Personal circumstances can not be relied on for socially provided sites as pitches can not

be allocated on a personal basis but must be made available for any Gypsy-Traveller. Merely identifying a site in the Local Plan does not remove the need to demonstrate very special circumstances for the determination of any subsequent planning application. It is necessary for the Council to alter the Green Belt boundary in accordance with para 15 PPTS and para 85 NPPF. In particular it is necessary that the LPA is satisfied that any site to be inset from the Green Belt has defensible boundaries. This exercise has not been followed. This approach has been explored as part of the Solihull EIP for a Gypsy-Traveller local plan, and is being followed by Guildford and South Staffordshire with the production of their local plans.

If the Council intend to develop more pitches on the site they may have to consider inseting the site in the Green Belt and they should assess whether the boundaries are deliverable and how/ why this site is more preferable than the other sites put forward for private sites and considered at appeal. I am told site residents believe land at the entrance remains undeveloped due to underground services. It is not known if the land is capable of being developed. A feasibility study should be carried out to establish the suitability of the site.

-pitches at Colne Park are allocated on a very restrictive basis by Locata Housing Services. The 2014 GTAA confirms that a waiting list is no longer maintained however the October 2014 Jackets Lane appeal decision reports a waiting list of 12 (para 117). The same appeal decision also noted that applicants must be resident in the Borough 10 years before they can be accepted on the waiting list (see para 117 27.10.14 Secretary of State appeal decision for site at Jackets Lane).

-there is a need to provide choice of site by location, tenures, size, ethnicity etc.

Summary

In summary it is concluded that the policy approach to Gypsy-Traveller site provision is not sound or positively prepared and is not compliant with
Policy H3 Local Plan part 1 Gypsy and Traveller Pitch provision
Para 47 NPPF which requires full objectively assessed need appraisals
Para 50 NPPF to provide a wide choice of homes to meet local need
Para 85 NPPF on Green Belt Boundaries
Para 4 PPTS which seeks to promote private sites
Para 6 PPTS which requires a robust evidence base
Par 15 PPTS which requires any alterations to the Green Belt boundary to be made through the local plan process only where there are exceptional circumstances.

I am most concerned that the Local Plan Part 2 fails to have regard to the outcome of recent appeal decisions for Gypsy-Travellers.

I am concerned that the Local Plan Part 2 if adopted as proposed will fail to address the immediate and pressing need for more sites in this part of Greater London.

Regard should be had to the London Assembly update of progress within Greater London. Their report is due by the end of 2014/ early 2015. There is no evidence adjoining authorities are willing or able to assist London authorities with the need to make more provision for Travellers.

I am concerned that the voice of local Gypsy-Travellers has not been heard or taken into consideration. A fairer, more open and inclusive consultation exercise is necessary.

I wish to be kept informed of progress with the Examination of this document and any revisions/updates.

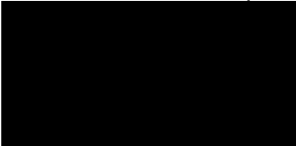
Yours faithfully

Mrs Alison Heine

Part A - your details

Please note: Respondent details and representations will be forwarded to the Secretary of State for Communities and Local Government when the Local Plan Part 2 is submitted for examination. Copies of representations cannot be treated as confidential however personal contact details will be removed from representations published electronically.

Your name and address

Title	Mr
First name	David
Last name	Brough
Address	Botwell Green Library
	
Postcode	
Telephone, including area code	
Email	
Organisation (if relevant)	Hayes Town Partnership

Agent's name and address (if applicable)

Title	Nothing selected
First name	
Last name	
Address	
Postcode	
Telephone, including area code	
Email	
Company	

Part B - your response

Please complete Part B for each representation you wish to make. Clicking on the ADD button at the bottom will display another Part B.

I am commenting on	Local Plan Part 2 Site Allocations and Designations
To which part of the Local Plan Part 2 does this representation relate:	
Policy number	As itemised in the response
Paragraph number	As itemised in the response
Table or figure number	
Map number (Atlas of Changes)	

Do you consider that the Local Plan Part 2 is	<input checked="" type="checkbox"/> Sound
	<input checked="" type="checkbox"/> Prepared in accordance with the duty to cooperate, legal and procedural requirements?
If you consider the Local Plan Part 2 to be unsound, indicate your reasons	<input type="checkbox"/> It has not been positively prepared
	<input type="checkbox"/> It is not effective
	<input type="checkbox"/> It is not justified
	<input type="checkbox"/> It is not consistent with National policy

Please give details of why you consider the Local Plan Part 2 is not legally compliant or is unsound or fails to comply with the duty to co-operate. (Please be as precise as possible. If you wish to support any aspects of the Plan, please also use this box to set out your representation.)

Overview

The Hayes Town Partnership was set up by the Council some years ago to assist in the regeneration of Hayes and consists of representatives of the Council, the Police, Hayes Town Business Forum, Hillingdon Chamber of Commerce, Uxbridge College, Brunel University and major developers. The comments given in this response are a collective summary of the views of the Partnership and each specific point is not necessarily shared by every member, some of whom will be making their own responses.

As a key local partner the Partnership welcomes the

opportunity to comment on and influence Part 2 of the Local Plan. The Partnership broadly welcomes the proposals to achieve regeneration and growth in Hayes and recognises the need for this structural approach in delivering change. In particular it accepts and supports specific proposed Development Management Policies in the following areas:

- Release of surplus industrial and warehousing land as part of a managed process (para 2.3)
- Protection and enhancement of town centres as crucial to social, economic and environmental wellbeing and in promoting a sense of identity (para 3.1)
- Resistance, other than in exceptional circumstances, to the development of out of centre locations for town centre uses (Policy DMTC1B)
- Support in appropriate town centre locations of night-time activity (para 3.20)
- Restrictions within the limits of present planning laws to prevent the proliferation of minicab offices, betting shops and takeaways (Policy DMTC4)
- Promotion of safety and planning for safer places (DMHB15)
- Provision of appropriate community facilities and inclusive access to such facilities as an essential prerequisite for the proper functioning of the community (para 7.1)
- Retention of existing community, sport and education facilities (Policy DMCI1) although it would like to see specific mention of facilities for young people.
- Recognition of the importance of providing sites for religious worship and assembly (para 7.15) although it considers that there needs to be a clearer set of policies to ensure that this is achieved.

It is recognised that representations on the draft Plan have to be framed in accordance with the relevant Regulations which require it to be sound and prepared in line with legal and procedural requirements. Rather than get into a debate about whether it is compliant or unsound the Partnership will focus its attention on making practical suggestions and comments on the contents of the Plan.

There is though one fundamental point that the Partnership wishes to make. Whilst it accepts the need to reduce the amount of employment land in Hayes and its replacement by mixed use developments it believes that the Plan fails to give sufficient attention or structure to the essential local services that are required to support the anticipated residential growth.

The Partnership recognises that it is not the role of the local plan consultation to address in detail the need for community facilities. The Partnership further acknowledges that there are proposals to improve the infrastructure particularly in relation to traffic management and plans to deal with the increasing demand for school places. There is however significantly less clarity in terms of provision for health and community facilities.

The Partnership feels that not dealing with local service provision at the same time as putting together proposals that will see the creation of an additional 2,000 residential units in Hayes Town is a significant oversight. Furthermore it is an oversight that could leave the residents of Hayes with a long term legacy of under provision in respect of community facilities.

Background

Until recently Hayes has been in decline as a town centre. It shares many of the features of other town centres up and down the country and has suffered in particular because of the closure of significant companies in its

industrial hinterland combined with the building of drive-in shopping facilities at other locations. However the coming of Crossrail offers Hayes a new beginning and a chance to re-invent itself as a vibrant 21st century town centre.

Interest in the future of the Town has already been shown by developers in the building of High Point Village and the extensive plans for the re-vitalisation of the former EMI site, now known as the Old Vinyl Factory. This level of interest is growing as the opening date for Crossrail comes nearer and it will be reinforced still further with the imminent availability of the Nestles site following the closure of the factory at the end of 2014.

The economic benefits expected from the high speed rail connection with central London mean that land prices will be rising and the potential for redevelopment can only increase. With such a promising background the Partnership feels that at the same time the Council is considering the adoption of the Local Plan part 2 it should also consider and respond to the consequences of the plan.

Need for coordinated approach

The draft proposals identify individual sites in different parts of the Town Centre and suggest that they may be suitable for development as shown in the following table:

Site Proposed development Units

Enterprise House Blyth Road Residential 75-80

Old Vinyl Factory Blyth Road Residential-led mixed use 642
Blyth Road and Station Road to canal Residential-led mixed use 248

Nestles site and adjoining land Mixed use 707

'Western Core' – Station Road Retail with residential above 60

Chailey Industrial Estate Pump Lane Mixed use 150

Silverdale Road/Western View Mixed use residential 300

If all these sites are developed as proposed there would be the following consequences:

- Hayes Town would have an additional 2182 to 2187 housing units, more than one third of the total planned for the whole Borough
- There would be enormous pressure for additional school places, health services, play space, youth provision and ancillary services such as dentists.
- There would be a substantial increase in traffic and pressure on parking
- The current Hayes Young People's Centre and the YMCA Hostel (Ventura House) would both be lost
- The Hesa Primary Care Centre would need to be replaced

It is the strongly held view of the Hayes Town Partnership that it would not be desirable or realistic to provide an additional 2000 housing units in the Town Centre without having an outline planning framework or area plan to show how essential support facilities are to be in place for the increased numbers of people who would be living in what is an already crowded area. Without such a framework the Local Plan would be in danger of not maximising the potential that Crossrail and the Nestles and the Old Vinyl Factory sites offer to Hayes.

Potential development of Grand Union Canal frontage

The Plan proposes some development alongside the Grand Union Canal but in the opinion of the Partnership it misses a once in a lifetime opportunity to make use of the enormous potential presented by the fact that the Canal passes through the heart of the Town Centre. It is one of the hidden assets of Hayes but its benefits have yet to be

realised.

Like town centres in other parts of the country Hayes turned its back on the canal many decades ago but over the last twenty years or so many of these towns have recognised that the water frontage offers a unique opportunity to transform their centres into attractive places to live, work and shop. Examples include Birmingham, Banbury and Reading.

The building of the High Point Village housing development has been a step in the right direction and the proposal to release of the Nestles site mentions the possible use of the canal frontage (but only as the place to locate high rise housing). The development of the Silverdale Road/Western View site would also offer the prospect of an attractive development on the north side of the canal although a notable omission is the lack of any reference to Shackles Dock and its potential. Of greater significance is the whole southern side of the canal from Station Road to Printing House Lane which could be transformed into an active water frontage that would give Hayes a central core in place of the strung-out ribbon-development of Station Road and Coldharbour Lane.

Comments on specific sites

In addition to the above general observations the Partnership has the following detailed comments on specific sites:

'Western Core' (Station Road)

The boundaries of this site should be re-examined to ensure that it includes the large area of waste land behind McDonald's stretching through to Botwell Lane. Much of this land is not in productive use and currently attracts a range of anti-social behaviour including rough-sleeping, rubbish-dumping and worse.

The northern boundary of the site might also be reviewed since the present building occupied by the Methodist Church is in poor condition and could probably benefit from redevelopment.

Chailey Industrial Estate

The Plan proposes to release the Chailey Industrial Estate for mixed use development including the provision of 150 residential units. The Hayes Muslim Centre is currently located quite close nearby in the former Civic Hall in Pump Lane but this is inadequate for the numbers of people who use it, especially for Friday prayers. The limited space available also means that the Centre is unable to provide the community facilities and services that are needed for its members. The management of the Centre is committed to finding a new site on which to construct a purpose-built mosque.

The Local Plan recognises that Hillingdon includes a wide range of cultural, ethnic and religious communities and accepts that these groups often have difficulty in finding suitable locations for new buildings. It commits the Council to assist wherever possible but fails to make any specific proposals. The most pressing need in Hayes is for purpose-built facilities for the Muslim community and it is suggested by the Partnership that the release of the Estate from industrial use should be investigated to see if the site might be suitable for the building of a mosque. If such a proposal came to fruition it would be up to the Hayes Muslim Centre and any other interested groups to make a bid for its acquisition and development.

Silverdale Road/Western View

As mentioned in the earlier comments about the Grand Union Canal the Silverdale Road/Western View site has considerable development potential because of its water frontage. The location of the historic Shackles Dock in the middle of the site is a positive asset and presents the possibility that the Dock might be extended to its earlier length with the benefit of an attractive water-side development. There is an existing warehouse building to the north of the dock and although it is not listed its retention and conversion could contribute towards an active use of the water frontage. For these reasons it is considered that the requirement for the continued existence of the Dock should be stated specifically in any planning proposal.

In addition there is currently a public house at the Western View/Station Road junction and the proposed mixed use development should include provision for the continuation of a similar facility.

Benlow Works Silverdale Road

The Benlow Works in Silverdale Road is a Grade 2 listed building constructed in the early part of the twentieth century with a reinforced concrete frame and a brick exterior. It was the home of the Orchestrelle Company (a forerunner of EMI) but over the years it has fallen into a dilapidated state and is now on the Heritage at Risk Register maintained by English Heritage. This describes it as being in very poor condition with no solution agreed as to its future. While the building is currently in the strategic employment area it is suggested that this is a very similar situation to that faced by Enterprise House and that the Local Plan provides a good opportunity to review its future use.

Nestles site Nestles Avenue

With the impending closure of the Nestles factory this will be the single largest development site in Hayes Town and it offers huge potential. One of the biggest challenges that the site presents is its lack of connectivity with the town centre. To maximise the potential of this site in terms of providing employment and residential facilities, consideration needs to be given to how it can be linked to the town centre and also the railway station. Connectivity to the site could be improved by a pedestrian bridge across the canal and by opening up the canal towpath to link the Nestles site with the High Point Village development.

The canal frontage presents an opportunity to provide active uses such as cafes, restaurants and community facilities. The Hayes Canal and Craft Fair earlier this year highlighted substantial local interest in kayaking and this site would provide an ideal location for the development of a waters sports centre.

Please set out what change(s) you consider necessary to ensure the Local Plan Part 2 is sound or has been prepared in accordance with the duty to co-operate, legal and procedural requirements. (It will be helpful if you are able to put forward suggested revised wording of any or text. Please be as precise as possible)

Arising from the comments made in response to Question 6 the following changes are needed in order to improve the soundness of the Plan:

- Draw up a specific planning framework for Hayes Town Centre in order to ensure that essential support facilities and services are in place in order to meet the needs of the increased numbers of people who would be living in the Town Centre if the proposed developments go ahead.
- Review how the frontage of the Grand Union Canal could be used in a creative and co-ordinated way as a spur to regeneration and in particular examine the possibility of developing the frontage on the southern side of the canal between Station Road and Printing House Lane.
- Amend the boundaries of the 'Western Core' site for the reasons given.

- Investigate whether part of the Chailey Industrial Estate could be developed as a site for a purpose-built mosque.
- Ensure the protection of Shackles Dock and the continuation of a public house facility in any development of the Silverdale Road/Western View site.
- Consider whether the Benlow Works should be released from industrial use in order to ensure the restoration and proper maintenance of this Grade 2 list building.
- Explore the provision of a footbridge between the Nestles site and the Hayes Town side of the Grand Union canal.

Yes

If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

If you wish to participate in the oral part of the examination, please outline why you consider this necessary.

To explain the basis of the overall submission and to comment in detail on specific sites

Attachments

If necessary please attach any further information to support your representation here - (note size limited to 10MB)

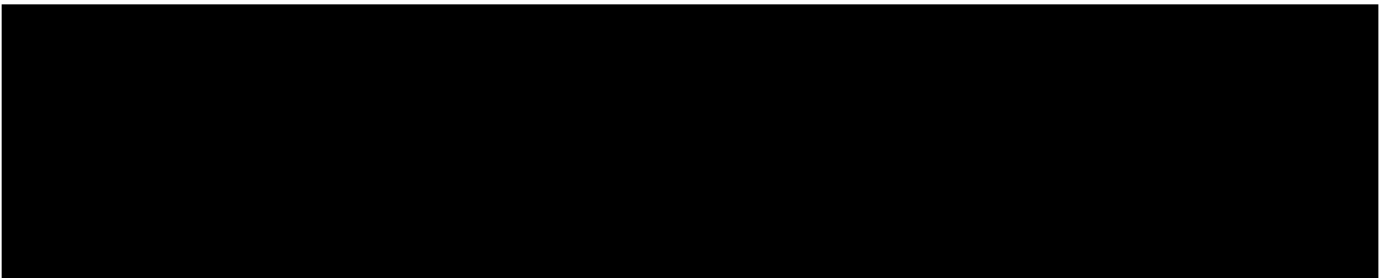
Part C - Information on the progress of the Local Plan Part 2

Would you like to be updated on the progress of the Plan?

Which would you like to be informed of:

- When the Local Plan Part 2 Plan has been submitted for independent examination.
- The publication of the recommendations of the person appointed to carry out the independent examination of the Local Plan Part 2.
- The adoption of the Local Plan Part 2.

Monitoring



or any of the additional information you submit

Representations on LB of Hillingdon Local Plan Part 2 – Development Management Policies

Submitted on behalf of

Leigh Brothers &
Auris Construction Ltd

Policy DMH 6 Garden & Backland Development

The “*presumption against the loss of back gardens*” is unreasonable and inappropriate. It unnecessarily prejudices the opportunity to secure the LPA’s housing objectives and to address local housing need. There is inadequate local justification for this restrictive approach, which is thus inconsistent with National Policy, with the London Plan and indeed with Part 1 of the Local Plan. It establishes an unreasonably negative starting point, and thus has “*not been positively prepared*”.

Part 1 policy BE 1 (Built Environment) makes ref to the avoidance of “*inappropriate development of gardens*” (BE 1 para 9). This is less restrictive. It provides scope for a value judgement to be made through the dev management process as to whether any particular proposal is inappropriate in the individual circumstances of the case. The suggested Part 2 policy goes further and sets a negative starting point presuming that all back gardens should be retained but for exceptional cases.

Conflict with Part 1 policy BE 1.9 only arises where an individual proposal can be said to “*erode the character and biodiversity of a suburban area and increase the risk of flooding*”. The introduction into DMH6 of other matters, such as the need to “*maintain amenity space*” and “*the amenity of residents*” takes the criteria further than is intended in BE1. The first bullet-point’s insistence on retaining land which contributes to the amenity of residents or provides wildlife habitats, will surely be seized on to prevent most new garden development, however limited the impact.

The wording confuses back garden development and backland development. The two are not necessarily the same. There are many locations where a corner property has a long return road frontage which could be developed (perhaps with adjoining gardens) in a manner which does not result in backland development in the accepted sense. It would not give rise to tandem development or other difficulties, and would not prejudice other objectives.

This form of rear garden development can be highly sustainable, making use of established infrastructure, eg highway frontage, utility services, etc. Such sites are usually within established residential areas and are often close to support facilities (shops, schools and other amenities) and accessible to public transport. This and other forms of rear garden development are often capable of being assimilated into the area without serious conflict in terms of character, biodiversity or flooding.

The NPPF requires that “*housing applications should be considered in the context of the presumption in favour of sustainable development” (para 49). Among other things, this means that:*

“local planning authorities should positively seek opportunities to meet the development needs of their area ;

The Framework identifies 12 Core planning principles. These include the provision that planning should:

“pro-actively drive and support sustainable economic development to deliver the homes that the country needs. Every effort should be made objectively to identify and then meet the housing needs of an area and respond positively to wider opportunities for growth”
(NPPF para17).

The housing shortage in London as a whole is well-documented, and is now a high-profile political and planning issue. The Local Plan is prepared in the context of the adopted London Plan 2011, which provides a minimum target figure of just 425 new dwellings pa for Hillingdon. However, the increasing housing need is reflected in the draft Further Alterations to the London Plan (FALP) 2014, which have recently been through their EiP. They point out that:

“there is clear evidence that London’s population is likely to increase significantly more than was anticipated in the past by up to 2 million in the 25 years to 2036 significantly above that assumed in the 2011 Plan. the number of households in London could rise by 1 million by 2036”. (FALP 2014 para 3.16).

The above figure of 2 million replaces the previous figure of just 1.3 million in the adopted London Plan 2011. The FALP therefore proposes substantially increased Housing targets for the Boroughs. The annual figure for Hillingdon is shown to be raised by over 31%, from 425 pa to 559 pa.

Hillingdon Council has objected to this increase, saying that it “*reflects an unrealistic allowance for small sites (sites less than 0.25ha)*” (LBH reps on FALP 2014). However the Mayor of London has not seen fit to modify the figure for the EiP. The higher target therefore stands at this stage.

Part 1 of the Local Plan confirms that:

“The Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved in accordance with other Local Plan policies.” (HLP policy H1)

This is entirely appropriate, but the introduction of stricter Part 2 policies – including a presumption against back garden loss – will militate against the achievement of this objective, both for the 2011-based figure, and for any proposed increase in this figure.

A key component of the LPA’s housing target is an allowance for ‘small sites’ ie under 0.25 ha. The Council points out that *“an average of 174 units pa have been delivered in Hillingdon from sites of this size”*. The LPA relies on this as a *“sound basis”* for a windfall allowance and it thus multiplies this figure by 5 to provide a figure of *“870 units to be delivered from windfall sites”* in the first 5 years of the plan (SA&D para 3.9). To maintain this figure, I suggest that development management policies must be no stricter than previously.

Not only will policy DMH 6 reduce opportunities for housing provision but it will also reduce dwelling choice. Rear gardens can often accommodate individual family-sized dwellings with private gardens (albeit modest ones), thus addressing the identified need (LP Part 1, para 6.12). They also provide the opportunity for new family homes in lower-density residential locations suitable for those who prefer not to live in the allocated larger-scale higher-density schemes in more central locations.

Finally, these small plots are the lifeblood of many smaller builder-developers, who cannot compete for, or manage, the development of larger sites. They include small family businesses such as my clients. This conflicts with policies to support the needs of different sectors of the economy including SMEs, who are considered *“especially important for local regeneration in suburban areas”* (Part 1 para 5.47 & policy E6).

For the above reasons, the Part 2 Plan is considered unsound and should be reworded to reflect my above submissions.

Robin Bretherick FRICS DipTP MRTPI

Robin Bretherick Associates



3 November 2014

RAB/PC4/Hillingdon Loc Plan objection