



HILLINGDON

LONDON

Local Plan Part 2

Proposed Main Modifications Representation Form

Representations are invited on the following documents:

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

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

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

PART A - Personal Details

Your Details	Your Agent's Details (if applicable)
Title: Mr	Title: Mrs
Surname: Murphy	Surname: Futter
Forename: Peter	Forename: Kerry
Organisation/Company: Bourne End Investments Ltd	Organisation/Company: KF Planning Consultancy
Address: c/o Agent Postcode:	Address: [REDACTED] [REDACTED] [REDACTED] Postcode: [REDACTED]
Contact No:	Contact No: [REDACTED]
Email:	Email [REDACTED]

PART B - Your representation.

Please use a separate sheet for each representation

Name or Organisation: Bourne End Investments Ltd

Q1. Which document are you making a representation on?

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

Q2. To which Main Modification does this representation relate?

MM31

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

Use of the phrase 'sites should be developed in accordance with the broad parameters of the approved scheme' on sites through the Site Allocations Document but more specifically in relation to Site SA39 Site A Trout Road.

Q3. Do you consider the Main Modifications are:

Legally Compliant?

- Yes No

Sound?

- Yes Yes, with minor changes No

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

- Positively Prepared?
- Justified?
- Effective?
- Consistent with National Policy?

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

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

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

The amendment of the policy wording away from references to sites being developed in accordance with specific existing planning permissions is supported (in accordance with discussions during the hearing) as referred to in MM30.

However, the proposed wording within the Site Allocations document that “sites should be developed in accordance with the broad parameters of the approved scheme’ are not considered the most suitable alternative wording. For example, ‘broad parameters’ could be viewed as an established approved mix of uses which may no longer be viable or most appropriate for the site. It retains too much uncertainty as a basis to the site coming forward for redevelopment in the future.

Existing London Plan Policy 3.4 stresses the importance of optimising housing capacity on development sites and emerging Policy D6 strengthens this further confirming that proposed residential development that does not demonstrably optimise the housing density of a site in accordance with the policy should be refused.

Further, consistency should be ensured for all the allocation sites. It is noted, for example, that under MM59 for the COMAG site that Site B has an existing planning permission but this is not referenced and the wording used (that the Council will

support proposals for residential development in accordance with London Plan density guidelines and subject to the agreement of design principles. Proposals should integrate with and complement development on adjacent sites) is not comparable with that applied to the SA 39 Site A Trout Road site.

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

Ensure consistent wording and approach for policies throughout the Site Allocations Plan.

Amend the wording within the relevant Site Policies within the Site Allocation Document but most specifically to Site Policy SA39 Site A for Trout Road to:

“The site should be developed primarily for residential use in accordance with the existing London Plan Policy 3.4 and emerging Policy D6 which seek to optimise the capacity of development sites”

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

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

Yes, I wish to participate at any further oral part of the examination

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

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

The wording of the Site Allocation document and specific Policy wording for Site SA39 Site A Trout Road are essential to bringing forward the site for re-development and the amended wording to date is not considered to fully reflect the discussions on this issue during the Examination session in August 2018.

Name:

Kerry Futter – KF Planning Consultancy

Date:

07/05/19

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

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

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

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

Submitting your representation

Please return this form:

By email: localplan@hillingdon.gov.uk

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

All forms must be submitted by **5:00 pm** on

Wednesday 8 May 2019.

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