



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:	Title:
Surname:	Surname:
Forename:	Forename:
Organisation/Company: Brunel University London	Organisation/Company: Avison Young
Address: [Redacted]	Address: [Redacted]
Contact No:	Contact No: [Redacted]
Email:	Email: [Redacted]

PART B - Your representation.

Please use a separate sheet for each representation

Name or Organisation:

Q1. Which document are you making a representation on?

Local Plan Part 2 Schedule of Proposed Main Modifications

Further Addendum to the Sustainability Appraisal

Q2. To which Main Modification does this representation relate?

See attached letter

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

See attached letter

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:

x Positively Prepared?

x Justified?

Effective?

x 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.*

See attached letter

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:

See attached letter

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.

Brunel University London is the borough's principal higher education institution and has significant development needs that have not been accounted for as part of the plan.

Name:

Avison Young

Date:

08/05/19

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.

Our Ref:
Your Ref:

7th May 2019

Planning Policy Team
3N/02
Residents Services
Civic Centre
High Street
Uxbridge
UB8 1UW

Dear sir/madam

**Local Plan Part 2
Representations to Schedule of Proposed Main Modifications**

We write on behalf of Brunel University London (BUL).

We have reviewed the proposed Main Modifications and consider that these are insufficient to make the draft plan sound in respect to the matters raised by BUL at the public hearing hearings and via representations. As a consequence we consider the plan to remain unsound on the following grounds:

- (1) It has not been informed by an up to date objective assessment of the development needs of the HE/research and healthcare sectors (including the specific needs of BUL and the Trusts) 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 in particular NPPF (2012) paragraphs 14, 17, 19, 20, and 182)
- (2) It proposes to designate land at BUL (Sites 4 and 6 of the Uxbridge Campus) as a 'Nature Conservation Site of Borough Grade 2 or Local Importance'. However, there is insufficient evidence to justify the designation, consequently the Plan is not justified in this regard.

We consider that the following further Main Modifications are required in order make the plan sound:

- (1) Add policies to meet assessed Higher Education (HE) and healthcare needs, to include:
 - The allocation of BUL's Uxbridge campus (Sites 1-7) for HE/research and healthcare uses;
 - A Green Belt boundary review that removes the Green Belt designation from Sites 1, 2, 3 (northern part), 4, 6 and 7 of the University's Uxbridge campus; and
 - The allocation of the existing Hillingdon Hospital site for residential and/or healthcare uses.



Page 2

(2) Delete the proposed designation of Sites 4 and 6 of BUL's Uxbridge campus as a Nature Conservation Site of Borough Grade 2 of Local Importance.

The explanation for the above is set out in our Hearing Statement (July 2018) and written representations.

Please contact Nick Alston at Avison Young should you have any queries.

Yours faithfully

A solid black rectangular box used to redact the signature of the representative.

**For and on behalf of
GVA Grimley Limited t/a Avison Young**