



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: Miss
Surname:	Surname: Vincent
Forename:	Forename: Anna
Organisation/Company: intu Properties plc	Organisation/Company: Lichfields
Address: c/o Agent	Address: [REDACTED] [REDACTED]
Postcode:	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:

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?

MM6

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

Page 21

Supporting Text

Paragraph 3.7

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.*

MM6 adds the following supporting text to the town centre chapter:

“However, the Council will consider proposals which constitute a departure from the policies in this chapter, where they provide clear and long lasting benefits to the vitality and viability of town centres in the borough.” (page 26, paragraph 3.7)

The Council’s recognition of the need for flexibility in the application of town centre policies is welcomed, however the drafting remains problematic and as a result DMTC2 is not effective, justified or consistent with national policy.

According to the Council’s retail survey, 2016, 67% of the PSA was in A1 use, indicating that the 70% is unjustified, arbitrary and has already been breached. There is no evidence to suggest the vitality and viability of the town centre has been harmed by this threshold breach, and to the contrary the centre is very healthy and diverse. At present, the wording of Policy DMTC2 would not allow for any new uses other than A1 in the PSA and will mean that any new non-A1 town centre uses would be considered “a departure” from the policy and will need to show that they provide a “long lasting benefit to the vitality and viability of the town centre”. This adds additional policy tests that are unnecessary and not consistent with national policy.

Non A1-uses for example leisure or restaurant uses have an important role attracting and retaining visitors to the town centre. A shift away from the 70% threshold on Class A1 retail uses is necessary in order to encourage an appropriate mix of uses within the PSA, rather than deterring them.

In more recent years, the need for flexibility and appropriate mix of uses has become even more pressing as retailers and town centres continue to go through a period of change. The draft London Plan (2018) recognises the need for adaptation and diversification, *“To continue to thrive they will need to evolve and diversify in response to current and future economic trends, technological advances, consumer behaviours, and the development of the 24-hour city.”*

Similarly the new NPPF (2019) Paragraph 86 states that *“Planning policies and decisions should support the role that town centres play at the heart of local communities by... allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters”*.

Given the significance of these trends, this flexibility must be explicit in the policy, and not provided as an exception in the supporting text within the town centres chapter.

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:

The following amendment to policy DMTC2 is required to make it effective and bring it in line with national and London Plan policy.

*A In primary shopping areas, the Council will support the ground floor use of premises for retail, financial and professional activities and restaurants, café, pubs and bars, **and leisure, entertainment uses** provided that:*

~~i. A minimum of 70% of the frontage is retained in Use Class A1;~~

ii Use Class A5 hot food takeaways are limited to a maximum of 15% of the frontage

~~iii The proposed use will not result in a separation of more than 12 metres between A1 retail uses.~~

*~~iv ii The proposed use does not result in a concentration of non retail uses **or undermine the predominance of retail uses to a level that is considered harmful to its primary shopping area role** which could be considered to cause harm to;~~**and***

iii that** the vitality and viability of the town centre **will be supported.

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.

Intu Properties plc is a major town centre stakeholder and is a key stakeholder for the future delivery of the Council's city centre vision.

Name:

Anna Vincent of Lichfields

Date:

08.05.2019

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

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

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

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

Submitting your representation

Please return this form:

By email: localplan@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.