



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: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Brown	Surname:
Forename: Robin	Forename:
Organisation/Company:	Organisation/Company:
Address: [Redacted] [Redacted] [Redacted] Postcode: [Redacted]	Address: Postcode:
Contact No: [Redacted]	Contact No:
Email: [Redacted]	Email:

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?

MM 12, MM25, MM36, MM49, MM64, Further Addendum to SA

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

MM12 Policy, MM25 Policy, MM36 Map & Site Name, MM49 Policy, MM64 Map

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?

X Justified?

X 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.

MM12 Policy DMHB 17 Residential Density: (see answer to Q6 below): No justification has been presented and the Further Addendum to the SA is deficient in this respect as it inadequately assesses the MM as minor whereas it would change the sustainability performance of the plan. MM would not be in general conformity with the London Plan, in particular Policy 3.4 Optimising Housing Potential.

MM25 Policy DMCI 2 New Community Infrastructure: (see answer to Q6 below): As para 7.10 clearly states: “demand for [school] places in the south of the borough is still forecast to go, particularly in the Hayes area where the majority of housing growth is expected to take place”. In the fulfillment of proper and good planning and the achievement of sustainable development, sites for the new or expanded schools and other health and community infrastructure needed to support the quantum of development proposed should have been identified.

MM36 Eastern End of Blyth Road: Site lettering A, B, C on Map/Policy SA 3 and Site Information do not marry up.

MM49 Policy SA 23 Silverdale Road/Western View: That for Site C is premature, prejudicial and pre-empts the planning and democratic process of residents’ ballot in accordance with the requirements of the Mayor of London’s Good Practice Guide to Estate Regeneration 2018. Any such scheme should be proposed with existing and new residents and communities in mind. The pursuit of a demolition and build option would be detrimental to the existing residents and, given the good standard of accommodation, would not be environmentally sustainable, thereby not achieving

sustainable development.

MM64 Lake Farm School, Hayes: The Friends of Lake Farm Country Park have been discussed this MM at a recent open to all community meeting. That the proposed area for deletion from the Green Belt would be reduced in extent is welcomed. However, whilst the north eastern, eastern, and southern boundaries of the deletion are supported, the northwestern boundary is objected to given that it includes a car park that is part of Lake Farm Country Park. The school's western perimeter fence line is more or less a straight line from Botwell Common Road (at a point just east of the 'El Sub Stn' marked on the map) to the right angled south western corner of the proposed deletion. This western perimeter fence represents the most appropriate alignment as it is both a clearly defined physical boundary and the outer edge of the school premises on its western boundary. The school's dedicated car park is enclosed within the school's perimeter fence and is divided into 2 parts for staff parking and for visitors.

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:

MM12 Policy DMHB 17 Residential Density: delete the words: "which in some cases may exceed London Plan Standards". Reinstate deleted words: para 5.67 Given that Hillingdon's location as an outer London borough Delete proposed hr/ha numbers from Table 5.3 Residential Density Matrix. That is, do not change but retain original table. This would avoid the necessity to revisit the Addendum to the SA and re-assess through the SA procedure in this particular instance.

MM25 Policy DMCI 2 New Community Infrastructure: Bring forward sites for the new or expanded schools and other health and community infrastructure needed to support the quantum of development, particularly the new homes, identified in Part 2 and the Main Modifications. These are to be shown in the Site Allocations & Designations document/Policies Map.

MM36 Eastern End of Blyth Road: make typological correction.

MM49 Policy SA 23 Silverdale Road/Western View: delete the criteria listed under Site C, including the proposed number of units 400. And make necessary adjustments elsewhere in the Main Modifications, e.g. Table 3.3.

MM64 Lake Farm School, Hayes: The Friends propose that the proposed deletion's western boundary be the school's perimeter fence line and not include the park's car park. In all other respects, the boundary is not objected to.

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.

If reopened then I would like to take part in the debate and respond to the representations of other participants.

Name:

Robin P. Brown

Date:

8/05/2019

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:

- X The publication of the recommendations of the person appointed to carry out the independent examination of the Plan
- X 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.