



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 / Mrs / Miss / Ms / Dr / Other: Mrs	Title: Mr / Mrs / Miss / Ms / Dr / Other:
Surname: Lee	Surname:
Forename: Jessica	Forename:
Organisation/Company: Hillingdon Green Party	Organisation/Company:
Address: ██████████ ██████	Address:
Postcode: ██████████	Postcode:
Contact No: ██████████	Contact No:
Email: ██████████	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

X Further Addendum to the Sustainability Appraisal

Q2. To which Main Modification does this representation relate?

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

Further Addendum to the Sustainability Appraisal

2. Sustainability Appraisal Process. And 3) How the Main Modifications are Screened and Assessed

Q3. Do you consider the Main Modifications are:

Legally Compliant?

Yes No **Don't know**

Sound?

Yes **X** Yes, with minor changes No

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

Positively Prepared?

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.*

Referring to council's consultation webpage

<https://www.hillingdon.gov.uk/article/33780/Local-Plan-Part-2-Examination>

“ Live Consultation - Proposed Main Modifications to the Local Plan Part 2

As noted within the Post Hearing Advice Note, the Inspector has now identified various changes that he considers may need to be made to the Plan (known as 'Proposed Main Modifications') in order to make the Local Plan Part 2 a 'sound' plan. We are inviting your representations on these Proposed Main Modifications and supporting documents.

- [Notice of Consultation \[257KB\]](#)
- [Proposed Schedule of Main Modifications 2019 \[4MB\]](#)
- [Proposed Schedule of Minor Modifications 2019 \[462KB\]](#)
- [LPP2 Development Management Policies 2015 Clean Version with Proposed Modifications 2019 \[7MB\]](#)
- [LPP2 Site Allocations and Designations 2015 Clean Version with Proposed Modifications 2019 \[31MB\]](#)
- [Local Plan Part 2 Policies Map with Proposed Modifications 2019 \[68MB\]](#)
- [Further Addendum to Sustainability Appraisal 2019 \[822KB\]](#)
- [Supplementary Addendum to Equalities Impact Assessment 2019 \[190KB\]](#)
- [Screening for Appropriate Assessment Update 2019 \[149KB\]](#) ”

My response:

The screening process is described within and throughout the Further Addendum to Sustainability Appraisal. Section 2 Sustainability Appraisal Process refers to Updating the Baseline information. Section 3 How the Main Modifications are Screened and Assessed quotes the SEA Directive, which requires informing and consulting the environmental authorities (possibly Natural England) as stated in their website: <http://ec.europa.eu/environment/eia/sea-legalcontext.htm> .

The last of the above consultation documents on the website “Screening for Appropriate Assessment Update 2019” is a letter to Natural England Consultation Service. It invites them to respond to this consultation. It makes the statement “In summary, the Council Boundary does not include any Natura 2000 or Ramsar sites and therefore the only impacts to be considered in relation to appropriate assessment relate to indirect impacts.” It is tacitly inviting Natural England to agree with this simple statement, rather than consulting them.

The above letter to Natural England cannot form an adequate basis for excluding from the baseline the consideration of direct impacts to European protected habitats and species under the Habitats directive, and other directives aimed at protecting birds, water bodies, drinking water etc. The Colne Valley, which runs along the entire west side of the Borough of Hillingdon, contains many protected species and protected waterbodies and protected habitats and perhaps is or should be designated protected in its entirety.

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:

My recommendations are improvements to the screening process as described in the Further Addendum to Sustainability Appraisal and the Screening for Appropriate Assessment Update 2019.

The Hillingdon Local Plan should (without duplicating them) make clear the applicability of all levels of protection, not just National, and Local and Metropolitan designations, but European and International protected status of habitats and species and water bodies, so that potential developers, planning officers and people responding to planning will be aware that these protections also apply.

The Screening for Appropriate Assessment Update 2019 letter should be revised to ask Natural England for advice about what is or should be protected in Hillingdon. The consultation should be extended until a full reply is received. It should also ask if the Colne Valley meets the appropriate criteria for Ramsar or Natura protection or similar, and what steps need to be taken to get it recognised as such.

If the Defra biodiversity calculator is to be invoked (as mentioned in section MM16) there should be provision to exclude spurious results caused by dividing or multiplying by zero.

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

X 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.

I would like to make further representations on the fantastic biodiversity of the Colne Valley and the necessity of protecting the ground water.

Name:

Date:

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@hillingsdon.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.