



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?

MM60

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

Site Map, Policy wording and Site Information Table for SA39 Site A

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.

Site SA39 Site B for 44 units has been completed and is occupied and as such should be removed from the site map and policy table as an allocation.

Whilst we continue to support the allocation of Site SA39 Site A Trout Road, amendments are sought to some of the detailed elements of the policy:

Site Map – Whilst the site area for site SA39 Site A has been amended to include land fronting the high street (which is supported) the red line area continues to exclude further land in the ownership of our client fronting St Stephens Road as previously submitted (attached).

Policy wording SA39A - As set out in our representation to MM31 the reference to schemes being within the 'broad parameters' of existing planning permissions is not considered appropriate.

Site Information Table for SA39A -

The reference to the planning permission on the site is out of date and does not refer to reserved matters permission 38058/APP/2017/1340 approved on 6 December 2018.

The proposed development description is described as 'mixed use' which is not appropriate for the site. The description should read 'residential-led development' which is confirmed for Site SA39 Site A at Table 3.3. This description was discussed at the Examination in August 2018.

The proposed number of units indicates 149 but this description should be amended only to confirm that existing London Plan Policy 3.4 and emerging Policy D6 seek to optimise the capacity of development sites.

As referred to in previous representations and the subsequent Examination Hearing, other sites including SA39 Site B and Site C have been identified for full residential development and the same approach is also appropriate for Site A as (as confirmed in the table under 'Other Information') the land has been identified for release in full in the Council's Employment Land Study.

The PTAL rating shown in the table for Site A is stated as 2 whereas the PTAL for the site is 2 at the centre but 3 on a large proportion adjacent to the High Street and St Stephens Road.

The phasing for Site A of 2016-2021 is no longer realistic given reserved matters were subject to delays and only approved in December 2018.

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:

Remove Site SA39 Site B from the policy table and map as an allocation.

Update the planning history with reference to reserved matters application 38058/APP/2017/1340 approved on 6 December 2018.

Amend site plan with correct red line ownership including land at St Stephens Road with a site area totaling 2.31 ha.

Amend policy wording to remove 'broad parameters' and replace with:

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

(please also see representation submitted in relation to MM30 and MM31).

Correct the site area within information table.

Amend the development description for SA39 Site A to 'residential led'

Amend capacity to state 149 units as a minimum.

Amend PTAL rating for SA39 Site A from 2 to a mix of 2 and 3.

Amend indicative phasing for Site A to 2020-2026.

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 redevelopment 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.