

**HILLINGDON LOCAL PLAN PART 2 – PROPOSED MAIN MODIFICATIONS
CONSULTATION**

HEATHROW AIRPORT LIMITED

8 May 2019

1. Heathrow broadly welcomes the proposed Main Modifications to the Local Plan Part 2.
2. Our comments relate specifically to MM3, MM4, MM62 and MM63 but centre on the removal of hotel and office site allocations along the Bath Road. We support Hillingdon’s responsiveness to our representations and the requirements from the Inspector in his Post-Hearing Advice Note but the blanket removal of all site allocations on the Heathrow Perimeter goes beyond what is required to ensure alignment with the Airports National Policy Statement (ANPS). This is because some site allocations that have been removed do not sit within Annex B of the ANPS.
3. Our Further Written Submissions dated 26 July 2018 set out the extent of change required to ensure ANPS alignment. Specifically, at paragraph 5c we stated that:
...land within the boundary of an expanded Heathrow Airport shown in Annex B of the ANPS should be protected by a new policy which resists development which may prejudice the future development of the airport in accordance with the ANPS or which it would be unsustainable to develop in the knowledge that Heathrow Airport is to be expanded with a new runway and associated development. Land use designations within that boundary should be deleted from the Plan.
4. Appendix B of our representations also provide further discussion on this point at Notes 5 and 6. Our representations requested that any site allocations that conflict with the ANPS by reason of being within the Annex B boundary should be removed. We did not request that all site allocations be removed.
5. The Inspector’s Post-Hearing Advice Note dated November 2018 acknowledged this potential conflict between the site allocations and the ANPS. At Paragraph 5 he states:
*“...the Airports National Policy Statement has implications for the delivery of **some** site allocations for hotel and office growth in close proximity to Heathrow Airport.”*
[emphasis added].
6. Clearly, the Inspector understood that ‘some’, but not all, site allocations were located within the Annex B boundary.
7. Therefore, in order to rectify these parts of the Plan, we propose the following changes to the Main Modifications:

Main Modification	Proposed Change	Revised Text
MM3 Para 2.15, second sentence	Revert to original text	These areas are spatially defined...
MM3	Revert to original text.	...preferred locations of the Heathrow Perimeter , Stockley Park and Uxbridge Town Centre...

Policy DME 3 criterion A		
MM4 Para 2.26	Revert to original text.	Hotel growth will be encouraged in Uxbridge, and Hayes and on land outside designated employment sites on the Heathrow Perimeter.
MM63 Para 4.43	Reintroduce deleted text.	...specific use of land on the Heathrow perimeter and boundaries...
MM63 Para 4.43	Amend new final sentence.	Following the publication of the Airports National Policy Statement (ANPS) some locations identified on the Heathrow perimeter have been excluded due to the sites occupying land that is identified with in the ANPS Annex B boundary for the expansion of Heathrow.
MM63 Policy SEA 2	Partially reintroduce deleted text under part i)	Heathrow Perimeter as defined as areas shown on Map O.
MM63 Para 4.45	Partially reintroduce deleted text.	...Uxbridge, and Stockley Park LSEL, and the Heathrow Perimeter have...
MM63 Paragraph 4.48 and Map O	Partially reintroduce deleted map and text.	The Council seeks to protect the designated LSEs and Office Growth Locations on the Heathrow perimeter from further hotel development. Outside of the designated LSEs and Office Growth Locations, the Heathrow perimeter, together with Uxbridge and Hayes Town Centre, constitute the focus for hotel growth in Hillingdon. Map N-O below identifies the specific areas of the Heathrow perimeter that are considered suitable for both hotel and office growth. [Map O to be amended to remove those site allocations within Annex B of the ANPS]
MM63 Map N [O]	Partially reintroduce deleted maps and text.	[Maps and supporting text for Bath Road Clusters 3, 4, 5, 6 and 7 to be reintroduced]. [Map N we believe has been incorrectly labelled. This should be Map O].