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**Department: Planning**

Our reference: LDF17/LDD18/CG

Date: 07 May 2019

By email to: [localplan@hillingsdon.gov.uk](mailto:localplan@hillingsdon.gov.uk)

Dear Julia

**Planning and Compulsory Purchase Act 2004 (as amended);  
Greater London Authority Acts 1999 and 2007;  
Town and Country Planning (Local Development) (England) Regulations 2012**

**RE: Hillingdon Local Plan Part 2 – Proposed Main Modifications**

Thank you for consulting the Mayor of London on the proposed Main Modifications to Hillingdon's draft Local Plan Part 2 following the Examination Hearing sessions. As you are aware, all development plan documents must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor provided comments on the Revised Submission version of the draft Hillingdon Local Plan Part 2 on 07 December 2015 (reference: D&P/LDF14/LDD18/CG) and made a submission to the proposed modification published as part of the Examination on 27<sup>th</sup> July 2018. Officers made representations at the hearing sessions.

The Mayor has carefully considered the proposed main modifications and is of the opinion that they do not bring the Hillingdon Local Plan into general conformity with the London Plan. The overall Local Plan would allow the loss of further industrial capacity beyond the benchmark set out in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). In addition, the Local Plan would limit the amount of cycle parking provided by schemes and allow excessive car parking in some residential schemes that are not referable to the Mayor. This will impact congestion, emissions and public health. Please see TfL's letter attached as Annex 1 for more details.

The Mayor has afforded me delegated authority to make more detailed comments on his behalf as set out below. Representations from Transport for London (TfL), which I endorse, are included within this response.

**General comment**

As set out in the Mayor's submission prior to the hearing sessions, the Mayor published his draft London Plan for consultation on 1<sup>st</sup> December 2017. The hearing sessions are due to close in

late-May 2019 with the Panel report published in the Summer. It is anticipated the Mayor will publish his new London Plan early 2020. The Hillingdon Local Plan is required to be in general conformity with the current London Plan, however its policies will become out of date when the new London Plan is published. The draft London Plan and its evidence base is a material consideration in planning decisions.

In light of the above and given the Local Plan: Part 1 was published in 2012, and is therefore out of date, the Mayor would expect Hillingdon to carry out an immediate review of its Local Plan to take into account its increased housing target and other matters set out in the draft new London Plan.

Detailed comments on the proposed main modifications to the Hillingdon Local Plan Part 2 are set out in the table below.

### Responses to proposed main modifications

#### Hillingdon Local Plan Part 2

Main Modification Reference	Policy / Paragraph	Mayor's and TfL's response
MM1	Page 8 Paragraph 2.8	<p>The <b>text should be amended</b> to read:</p> <p><del>In accordance with relevant policies in the London Plan, mixed use developments will be supported where they assist with</del> <b>The renewal and modernisation of the remaining-existing office stock should not result in the loss of industrial capacity. Office redevelopments should be supported by improvements in public transport.</b></p> <p>Justification: The proposed Main Modification additional text is not clear and specific. This section of the plan relates specifically to SIL and LSIS and the proposed text could allow a variety of uses in designated industrial areas which would not be in conformity with the current or draft new London Plans. London Plan para 2.79 and draft new London Plan policy E4A set out appropriate uses in designated industrial areas. Policy E1 of the draft new London Plan is clear that new office floorspace in Outer London should be focused in town centres and extensions to other office clusters such as Stockley Park should be supported by improvements in public transport.</p>
MM12	Policy DMHB 17 Para 5.67	<p><b>Support</b></p> <p>It should be noted that the draft new London Plan no longer includes a density matrix. Despite this, the proposed</p>

		changes more closely reflect the design and housing delivery objectives of the current and draft new London Plans. The draft new London Plan encourages capacity to be assessed on a site by site basis in order to respond to local character and optimise density.
MM17	Page 82 Policy DMEI 7	<b>Welcome</b> the proposed changes in line with the Mayor's response to the Revised Submission version dated 7 December 2015.
MM29	Policy DMAV2	<p>The <b>text should be amended</b> to read:</p> <p><i>Amend policy wording and delete relevant footnotes as follows:</i></p> <p>A) Development proposals within the Heathrow Airport boundary will <b>only</b> be supported where:</p> <p>i) they relate directly to airport related use or development*;</p> <p><b>ii) there is no intensification of noise and aircraft movements or increase in car parking numbers beyond the currently permitted levels in the Secretary of State's decision on planning application 47853/93/24631;</b></p> <p>iii) there is no detrimental impact to the safe and efficient operation of local and strategic transport networks;</p> <p><b>iiiv)</b> they comply with Policy DMEI 14: Air Quality</p> <p>iv) there are no other significant adverse environmental impacts; where relevant, an environmental impact and/or transport assessment will be required with appropriate identification of mitigation measures; and</p> <p>vi) they comply with all other relevant policies of the Local Plan <b>and the London Plan.</b></p> <p>Justification: The Mayor supports the case for additional aviation capacity in the south east of England, however he wants the aviation industry to fully address its environmental and health impacts. These issues are better addressed in the draft the London Plan and therefore the Local Plan policy should refer to the most up to date policies which will be in the London Plan.</p>

### Site Allocations

MM33	Chapter 3, SA3, SA3A and SA4, SA22	The Mayor remains disappointed regarding the proposed loss of industrial capacity and SIL designations. He reminds Hillingdon that in line with the most up to date evidence prepared for the draft new London Plan, it is a borough that is to retain industrial capacity from a 2015 baseline. It could seek replacement and intensification of industrial
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		capacity as part of mixed used schemes.
MM64	Page 173-174	<b>Welcome</b> the reduction in the area to be released from the Green Belt so that the boundary will be tighter around the school.
MM67	Page 172 Falling Lane Recreation Ground, Yiewsley	<b>Welcome</b> the designation of additional Metropolitan Open Land

### Minor Modification

DM10	Housing Mix Paragraph 4.6	The proposed amendments do not provide an accurate picture of housing occupation and need in Hillingdon. The supporting text should also reflect the level of under occupation in the borough and therefore developments should include a range of housing sizes on a case by case basis in order to allow households to move to different size homes.
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If you would like to discuss any of my representations in more detail, please contact Celeste Giusti [REDACTED] who will be happy to discuss any of the comments.

Yours sincerely



**Juliemma McLoughlin**  
Chief Planner

Cc: Dr Onkar Sahota, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Lucinda Turner, TfL