

PROPOSED MAIN MODIFICATIONS TO THE HILLINGDON LOCAL PLAN PART 2

STATEMENT OF REPRESENTATIONS

MAY 2019

1. Introduction

1.1 A Schedule of Proposed Main Modifications to the Hillingdon Local Plan Part 2 was published for public consultation for a period of six weeks from 29th March to 8th May 2019. The consultation was undertaken by the Council on behalf of the Inspector appointed to examine the Local Plan Part 2.

1.2 The Local Plan Part 2 comprises Development Management Policies, Site Allocations and Designations and Policies Map. Once adopted it will deliver the detail of the strategic policies set out in the Local Plan Part 1: Strategic Policies (2012). The Council submitted the Local Plan Part 2 to the Secretary of State on 18 May 2018 to begin the Examination in Public. The revised submission version of the Local Plan Part 2 and the evidence documents on which it is based can be viewed in the Council's Examination web pages. The Examination hearing sessions took place in August 2018.

1.3 Following the conclusion of the public hearing sessions, the Council wrote to the Inspector on 4 September 2018 requesting that as part of the examination process, he makes recommendations to the Council for any main modifications to the Local Plan Part 2 considered necessary to make it sound. The purpose of this consultation was to seek views on those proposed modifications.

1.4 All specific consultation bodies and general consultation bodies were consulted in line with the approach taken throughout the preparation on the Local Plan Part 2. In addition to the above, those people who previously submitted representations in response to the Regulation 18 and 19 consultations on the Local Plan Part 2 were also informed of the consultation.

1.5 In total 27 individuals, organisations or statutory consultees submitted responses on the Proposed Main Modifications to the Local Plan Part 2, making approximately 40 individual representations were made. Four representations were also made on the Addendum to the Sustainability Appraisal. All of the responses to the consultation will be forwarded to the Inspector, who will take them into account before issuing his final report of the Local Plan Part 2. The general expectation is that issues raised on the consultation of the Main Modifications will be considered through written representations.

1.6 The Council also published a Schedule of Minor Modifications to the Plan during the same period. This schedule was published for reference only however two representations on this schedule were received. These representations will not be subject to consideration by the Inspector as part of the ongoing examination process but have been included in the summary table below.

2. List of Respondents

	Rep Ref	Organisation	Comments		Rep Ref	Organisation	Comments
1	ID17	Highways Agency		14	ID80	Elite Group	
2	ID28	Sport England		15	ID89	Intu Limited	Representations made do not relate to the Main Modifications
3	ID32	Natural England - no comment	No comments	16	ID98	Environment Agency	
4	ID38	Bourne End Investments - further oral session	Request appearance at further oral session	17	ID99	British Sign and Graphics Association	
5	ID42	Transport for London Commercial (Property)		18	ID127	Transport for London (Policy)	Representations made do not relate to the Main Modifications
6	ID44	Ickenham Residents Association		19	ID135	Robin Brown	
7	ID54	Thames Water	No comments	20	ID168	HS2	
8	ID56	Heathrow Airport Limited	Request appearance at further oral session	21	ID174	Legal and General	
9	ID57	London Diocese Fund	Request appearance at further oral session	22	ID 216	Mr and Mrs Farmery	Request appearance at further oral session
10	ID58	Mayor of London		23	ID217	Hillingdon Green Party	Request appearance at further oral session
11	ID62	Diocese of London	Request appearance at further oral session	24	ID218	Freshwater Group	
12	ID64	Canal & River Trust		25	ID129	Gatehill Residents Association	

13	ID75	Brunel University	Representations made do not relate to the Main Modifications	26	ID220	Inland Homes	
				27	ID221	Skyport Enterprise	Request appearance at further oral session

3. Summary of Main Issues

3.1 Following the review of the representations received, the Council identified the following main key issues:

- Queries regarding the continued inclusion of the density matrix, general conformity with the London Plan and the proposed changes to the thresholds.
- Concerns about the use of indicative figures and/ or broad parameters of planning consents to identify a housing capacity for site allocations on individual sites.
- Further changes sought to the proposed modifications on flood risk and waterside development.
- Concerns expressed regarding the removal of all office and hotel growth areas on the Heathrow Perimeter, specifically those outside of the area identified for Heathrow expansion. Other respondents support the removal of these sites but are seeking the inclusion of alternative site allocations.
- Concerns that the new policy on education floorspace does not sufficiently protect playing fields, that specific sites for new schools are not identified and that the criteria in the policy are unduly restrictive.
- Queries regarding the screening for an Appropriate Assessment and need for further sustainability appraisal in relation to changes to the density matrix and flood risk.

4. Summary of Representations - in order of Main Modification

Rep no.	Rep ID	MM Ref	Policy/ Para/ Figure	Legally Compliant	Sound?	Comment	Council's Comments/ Response
1	ID58	MM1	Page 8 Para 2.8	Not stated	Not stated	Further amendment sought to text to clarify approach of no loss of industrial capacity in industrial areas set out in the draft London Plan and to emphasise the need for public transport improvements to Outer London office locations.	<p>The additional text proposed in para 2.8 was agreed in a Statement of Common Ground with La Salle Investment Management.</p> <p>Para 2.7 already addresses the need for proposals in some Locally Significant Employment Locations (which include B1a) to address issues of accessibility. The proposed additional reference to public transport requirements would result in duplication.</p> <p>The proposed reference to no net loss of industrial capacity goes beyond the criteria set out in policy DME 1 which already refers to relevant policies in the London Plan.</p>
2	ID56	MM3		Not stated	Yes with minor changes	The removal of all Site Allocations on the Heathrow Perimeter is unnecessary as it goes beyond the extent of the boundary described in Annex B of the Airports National Policy Statement.	If the deletion of the growth allocations within Annex B remains necessary on the grounds of uncertainty, given the close proximity of these

						Detailed amendments set out in representation.	sites to the proposed area for Heathrow expansion, it is considered appropriate to remove all potential growth locations on the Heathrow Perimeter as well.
3	ID56	MM4	DME 5 Hotels and Visitor Accommodation	Not stated	Yes with minor changes	The removal of all Site Allocations on the Heathrow Perimeter is unnecessary as it goes beyond the extent of the boundary described in Annex B of the Airports National Policy Statement. Detailed amendments set out in representation.	If the deletion of the growth allocations within Annex B remains necessary on the grounds of uncertainty, given the close proximity of these sites to the proposed area for Heathrow expansion, it is considered appropriate to remove all potential growth locations on the Heathrow Perimeter as well.
4	ID75	MM4	DME 5 Hotels and Visitor Accommodation	Not stated	Not stated	Strongly support the removal of the Employment and Growth Area.	Noted.
5	ID99	MM11	DMHB12 to DMHB 13A	No	No	The text of the proposed new policy and supporting text remains in part incorrect and unsound, an in part unlawful. Parts of policy DMHB 13A which have been moved from policy DMHB 12 are unduly restrictive. Detailed comments set out in representation.	Agree for the need for cross referencing of original policy to be deleted. The other wording changes requested relate to wording as presented at the examination as part of policies DMHB 12 and DMHB 13.

6	ID42	MM12	DMHB 17 Residential Density Table 5.3	Not stated	Not stated	<p>Hillingdon's proposed approach of including a revised density matrix is not in conformity with the Draft London Plan. The increase in the upper limits proposed still do not allow for the flexibility that the draft London Plan seeks to achieve and may restrict development on sites that would be appropriate for higher densities due to site-specific circumstances. It is therefore recommended that Hillingdon bring their draft policies in line with the approach of the draft London Plan and remove the residential density matrix.</p> <p>In supporting text recognition should be given to the need to optimise sites with a PTAL of 3-6 which are located within 800m of a station or a town centre boundary.</p> <p>In order to optimise housing development, the policy and supporting text should recognise that the most appropriate development in accessible locations will be flats.</p>	<p>Table 5.3 is intended to be a local variation of the current London Plan matrix which has been adapted to reflect local character and context.</p> <p>It is considered that the proximity of a site to a station will be reflected in its PTAL.</p> <p>The council's evidence shows the overwhelming need is for family homes of 3 bedrooms or more. The starting point for all schemes should be to meet local need as far as possible in their design and this will be part of the appropriate optimisation of any site.</p> <p>It is considered that, for reasons discussed at the hearing sessions, conformity with the Draft London Plan is not required.</p>
7	ID44	MM12	DMHB 17 Residential Density Table 5.3	Not stated	Yes with minor changes	<p>The row "Residential areas with suburban character within 800m of a town centre" states that the "setting" could be "Suburban/urban".</p> <p>In this context, where the setting has been specified in the location, an area cannot be both urban and suburban.</p> <p>Detailed amendments included within representation.</p>	<p>The addition of urban reflects that areas within 800 metres of a station are likely to transition in character from urban to suburban as you move away from the central part of a town centre.</p> <p>The supporting text to the policy has also been modified to state that they are a</p>

							starting point for discussions on the issue of residential density, which should ultimately be determined by a design led approach.
8	ID58	MM12	DMHB 17 Residential Density Para 5.67	Not stated	Not stated	Support for the proposed modification which more closely reflects the objectives of the current and draft London Plan. It should be noted that the new London Plan no longer includes a density matrix.	Noted. It is considered that, for reasons discussed at the hearing sessions, conformity with the Draft London Plan is not required.
9	ID135	MM12	DMHB 17 Residential Density	Not stated	No	Not in general conformity with the London Plan, in particular Policy 3.4. Reinstate the original text. Detailed amendments included within representation.	The amendments to the table have been made to reflect the changes to the London Plan in 2015. The supporting text to the policy has also been modified to state that they are a starting point for discussions on the issue of residential density, which should ultimately be determined by a design led approach.
10	ID64	MM13	DMHB 20 Moorings	Not stated	Not stated	Have concerns that proposed modification to criteria (iii) may result in any moorings that 'separate people from the waterway' being viewed as unacceptable. Request changes to supporting text for clarification.	The Council believes the proposed wording strikes an appropriate balance between the potential for the provision of moorings and need to protect the access of other canal users.
11	ID58	MM17	DMEI 7 Page 82	Not stated	Not stated	Support for the proposed modification.	Noted.

12	ID174	MM17	DMEI 7 Biodiversity Protection and Enhancement	Yes	Yes	Support for modification to criterion D.	Noted.
13	ID98	MM18	DMEI 8 Waterside Development	Yes	Yes	The policy could be stronger still in criteria F - requiring contributions to biodiversity improvement for canal-side development to extended to all types of watercourse.	Noted. Biodiversity adjacent to other watercourses is addressed by criteria E.
14	ID98	MM19	DMEI 9 Management of Flood Risk	Yes	Yes	<p>The policy should reference the sequential or exceptions tests and their inclusion is recommended. Where development passes the sequential test a sequential approach within the site boundary should also be required.</p> <p>The policy fails to explicitly mention climate change adaptation and mitigation in the context of flood risk.</p> <p>The policy fails to explicitly mention that any development at risk of flooding, protected by a defence asset must be commensurate with the lifetime of the development.</p> <p>Detailed amendments to the policy included in representation</p>	<p>The proposed modifications have amended criteria A and B of the policy to address the concerns on the sequential test and exceptions test, climate change and protecting developments for their expected lifetime. It is not clear the response is based on these proposed amendments.</p> <p>The inclusion of Criteria F as proposed by the EA could be made an additional criterion to policy DMEI 8.</p>
15	ID98	MM20	DMEI 10 Water Management, Efficiency and Quality	Yes	Yes	<p>Suggest adding to the policy or support text reference to the Water Framework Directive and the need to enhance water quality.</p> <p>Detailed amendments to the policy included in representation</p>	Noted.

16	ID62	MM25	DMCI 2 New Community Infrastructure	Yes	Yes with minor changes	The policy does not establish the level need for SEN schools so that sufficient sites can be identified to meet this need.	The Council's Strategic Infrastructure Plan identified the current and anticipated SEN need will be met by consented schemes.
17	ID135	MM25	DMCI 2 New Community Infrastructure	Not stated	No	Sites for new or expanded schools and other health and community infrastructure required to support the quantum of development proposed should have been identified.	Chapter 7 of the Site Allocations document identifies the location of permitted new health and education facilities that are required. Planning applications to meet additional need for new community infrastructure will be assessed using the amended policies in Chapter 7 of the Development Management Policies document.
18	ID28	MM26	DMCI 1A (ii)	Not stated	No	<p>Proposed Modification MM26 indicates that proposals for new schools and school expansions would be assessed against the impact on games pitches, amongst others, and taking into account the character of the surrounding area.</p> <p>Sport England does not consider that this modification is consistent with national policy, namely the NPPF 2012 paragraph 74/NPPF 2018 paragraph 97, which specifically states playing fields should be protected, not merely games pitches as stated in Policy DMCI 1A ii.</p> <p>The loss or reduction in playing field must only be accepted where there is a clear surplus of provision, the playing field would be replaced or the proposal is for a sports facility the benefits of which outweigh the loss or partial loss of playing field land. This</p>	<p>Policy DMCI 1 sets out criteria for assessing the loss of existing community facilities which the supporting text in para 7.4 identifies as including 'facilities for outdoor sports' which would include playing field land.</p> <p>The loss of playing fields is not specific to the provision of new education facilities and is better addressed through this broader policy relating to all such provision.</p>

						matter could be overcome by stating that any proposals for new schools and school extensions shall not result in the loss of all or part of a playing field unless the playing field is replaced or the schools expansion is for a sports facility the community benefits of which outweigh the loss, or part loss, of playing field.	
19	ID62	MM26	DMCI 1A Development of New Education Floorspace	Not stated	Not stated	The new policy is considered acceptable in principle; however, we consider some areas of the criteria to be restricting when assessing which sites should be brought forward to address education needs. Specifically objections are made to the need to take account of the location and suitability of the site and its compatibility with existing planning designations such as green belt.	A full assessment of the suitability of a site to accommodate new educational floorspace should be undertaken in accordance with the proposed policy.
20	ID174	MM26	DMCI 1A Development of New Education Floorspace	Yes	Yes	Support proposed modification.	Noted.
21	ID219	MM28	DMT 6 Vehicle Parking	Not stated	Yes with minor changes	Incorrect referencing to Appendix C Appendix C makes repeated references to minimum requirements and should be clarified.	Noted. Reference should be correct to Appendix C, Table 1. Minimum requirements are included in the table with reference to technical matters e.g. the size of parking spaces however, part b) of the table which addresses parking standards, specifically identifies these to be

							maximum standards.
22	ID58	MM29	DMAV2	Not stated	Not stated	Add reference to the London Plan under criteria (vi) as the impacts of additional aviation capacity in the South East are better addressed in the Draft London Plan.	The London Borough of Hillingdon has an outstanding objection to the Aviation policy in the draft London Plan partially on the basis that the policy does not address all the potential impacts of an increase in airport capacity at Heathrow. The Airports National Policy Statement will also form the primary basis for decision making on any future DCO.
SITE ALLOCATIONS DPD							
23	ID38	MM30	Para 3.5	Yes	No	<p>Explanatory text requires an amendment to ensure the intent of this main modification is not achieved.</p> <p>Para 3.5 of the Site Allocation Document (main modifications) relating to the quantum of development on application sites should be amended to clearly state and confirm that: "Housing figures for all housing sites (with or without existing / historic planning permissions) are indicative only and final numbers will be determined through the development management process and in particular the requirement of the London Plan, and in particular existing London Plan Policy 3.4 and emerging Policy D6, which seek to optimise the capacity of development sites."</p>	<p>The proposed modification is intended to clarify that the housing figures in the plan are indicative.</p> <p>A minor modification has been proposed to para 3.6 has been proposed by the Council in support of MM30 which states <i>'The net completion figures for sites allocated for residential development that do not have planning permission are provided as a baseline, to guide future planning applications and to</i></p>

						The Policy Tables in the document (including Policy SA39 Site A) should be amended to reference minimum capacity / units to ensure capacity can be optimised in accordance with policy.	<i>demonstrate the number of units that could be accommodated. As and when these sites come forward, it is recognised that the final number of units will be determined by a design led process.'</i>
24	ID38	MM31	SA39	Yes	No	<p>The amendment of the policy wording away from references to sites being developed in accordance with specific existing planning permissions is supported (in accordance with discussions during the hearing) as referred to in MM30. However, the proposed wording within the Site Allocations document that "sites should be developed in accordance with the broad parameters of the approved scheme' are not considered the most suitable alternative wording. For example, 'broad parameters' could be viewed as an established approved mix of uses which may no longer be viable or most appropriate for the site. It retains too much uncertainty as a basis to the site coming forward for redevelopment in the future.</p> <p>Amend the wording within the relevant Site Policies within the Site Allocation Document but most specifically to Site Policy SA39 Site A for Trout Road to: "The site should be developed primarily for residential use in accordance with the existing London Plan Policy 3.4 and emerging Policy D6 which seek to optimise the capacity of development sites"</p>	<p>The proposed modification is intended to clarify that the housing figures in the plan are indicative.</p> <p>A minor modification has been proposed to para 3.6 has been proposed by the Council in support of MM30 which states '<i>The net completion figures for sites allocated for residential development that do not have planning permission are provided as a baseline, to guide future planning applications and to demonstrate the number of units that could be accommodated. As and when these sites come forward, it is recognised that the final number of units will be determined by a design led process.'</i></p>

25	ID42	MM33	SA16 Northwood Station	Not stated	Not stated	Suggested that “To be determined by design and phasing” is included for both 2016 – 2021 and 2021 – 2026.	Proposed amendment is supported for consistency.
26	ID58	MM33	SA3 SA3A SA4 SA22	Not stated	Not stated	The Mayor remains disappointed regarding the proposed loss of industrial capacity and SIL designations.	Noted.
27	ID218	MM33	SA24	Yes	Yes with minor changes	Amendment to restrict site to 36 residential units is unsound.	The housing figures provided in the plan are indicative and the final number will be determined by the development management process as per minor amendment to para 3.6 of the Site Allocations document.
28	ID220	MM33	Table 3.3 SA14 Master Brewer	Yes	Yes with minor changes	Further justification is required for the proposed number of units on site. Query removal of reference of improving access to Freezeland Convert.	The housing figures provided in the plan are indicative and the final number will be determined by the development management process as per minor amendment to para 3.6 of the Site Allocations document. Any proposed improvements to adjacent Green Belt will be assessed in line with relevant policies in the Development Plan.
29	ID135	MM36	SA3 Eastern end of Blyth Road	Not stated	No	The site lettering on the Map and in the Site Information table does not match up.	Agreed. Sites C and B have been in correctly labelled and should be corrected.

30	ID80	MM39	SA5 Nestle Avenue	Not stated	Not stated	<p>The increase in the dwellings numbers which was presented to the Inspector prior to the EIP is supported by Elite, specifically the increase in the number of dwellings which are required to be delivered across Site B.</p> <p>The supporting policy text now states that "proposals from individual landowners should, as far as possible, come forward in a coordinated manner without prejudicing the development aspirations on other parts of the site". This is additional supporting policy text is strongly supported by Elite</p> <p>Additional policy text has also been added to the site allocation which states that "Subject to the outcome of area specific studies, the Council may consider an approach to car parking which departs from the standards set out in this plan, if supported by relevant public transport improvements and other mitigating measures". This is strongly supported by Elite and recognises the site allocations highly sustainable location next to Hayes and Harlington Station of which will benefit from Crossrail in the near future which will benefit the sites PTAL rate increasing it from 4 – 5 in 2021.</p>	Noted.
31	ID168	MM45	SA19 Braintree Road, South Ruislip	Not stated	Not stated	Reference should be added to the Site Information Table to highlight that part of the site is located with safeguarded land for HS2. The land is intended to provide a main construction compound for HS2.	Noted. Propose the Site Information Table is updated accordingly to reference HS2 Safeguarding.
32	ID57	MM48	SA22 Chailey Industrial Estate	Yes	Yes with minor changes	It is suggested that a more flexible mixed use description of the proposed non-residential uses is inserted in the site allocation in place of the current specific reference to retail.	The Council would support a more flexible approach and the change of the proposed development type to 'Mixed

						Change proposed development type in site information table from Retail/ Residential to 'Residentially-led, mixed use'	use'.
33	ID135	MM49	SA23 Silverale Road	Not stated	No	The allocation of site C is premature and pre-empts any future democratic process. Potential number of units should be deleted from the site information table	Noted. The allocation of the site indicates an opportunity for development and provides an indicative capacity. The details of any future planning application will be subject to relevant statutory consultations as a minimum.
34	ID218	MM50	SA24 Benlow Works	Yes	Yes with minor amendments	<p>Additional wording sought to the development principles regarding creating an acceptable resident environment. The policy should also reflect that residential is a preferred use for the site.</p> <p>References to repairing and preserving the building should be reserved as the building is listed and will be subject to an appropriate heritage assessment.</p> <p>Detailed amendments are set out in the representation.</p>	The site allocation provides guidance for all future development proposals that may come forward for the site. It is not considered appropriate to amend the development principles to reflect the requirements of specific development proposals which can be dealt with through the development management process.
35	ID38	MM60	SA39	Yes	No	<p>Various amendments sought to Site Information Table and map including:</p> <p>The removal of Site B which has been completed.</p> <p>Update planning history to reflect reserved matters application 38058/APP/2017/1340.</p> <p>Amend site plan to reflect ownership (information provided).</p> <p>Remove reference to schemes being within the</p>	<p>Support factual modifications regarding planning permission reference and site plan where correct.</p> <p>More generally, the site allocation provides guidance for all future development proposals that may come forward for the site. It is not considered appropriate to amend the development</p>

						<p>'broad parameters' of existing planning permission is not considered appropriate.</p> <p>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.</p> <p>Remove the proposed number of units.</p> <p>Amend PTAL rating to 2-3.</p> <p>Amend phasing to 2020-2026.</p>	<p>principles to reflect the requirements of specific development proposals which can be dealt with through the development management process.</p>
36	ID54	MM63	SEA 2: Hotel and Office Growth Locations	Not stated	Yes with minor changes	<p>The removal of all Site Allocations on the Heathrow Perimeter is unnecessary as it goes beyond the extent of the boundary described in Annex B of the Airports National Policy Statement.</p> <p>Detailed changes proposed within representation.</p>	<p>If the deletion of the growth allocations within Annex B remains necessary on the grounds of uncertainty, given the close proximity of these sites to the proposed area for Heathrow expansion, it is considered appropriate to remove all potential growth locations on the Heathrow Perimeter as well.</p>
37	ID221	MM63	SEA 2: Hotel and Office Growth Locations	Yes	Yes with minor changes	<p>The Main Modifications are not justified based on the Hotel Need evidence and that additional hotel sites should be allocated, along Bath Road outside the area of proposed Heathrow expansion.</p> <p>Detailed changes proposed with representation.</p>	<p>It is considered that issues related to the need for additional hotel provision should be addressed through an early review of the Local Plan and that it is not appropriate to introduce new allocations at this stage.</p>

38	ID58	MM64	Lake Farm School, Hayes	Not stated	Not stated	Welcome the reduction in the area to be released from the Green Belt.	Noted.
39	ID134	MM64	Lake Farm School, Hayes	Not stated	No	The proposed alteration to the green belt boundary extends beyond the school boundary and includes the car park for Lake Farm Country park. The boundary should be altered to reflect the school site boundary.	Noted. Proposed to amend the boundary to exclude the Lake Farm Country Park car park.
40	ID216	MM66	Dairy Farm and Spinney Harefield/ Cricket Ground and Spinney	No	No	<p>In March 2019 the area was identified as The Cricket Ground and Spinney. This map no longer showed the developed former garden of Little Hammonds. The supplementary texts stated that 'The site boundary should be amended to exclude new development to the east of Dairy Farm Lane'. This is misleading as the area now excluded was to the west of Dairy Farm Lane the area to the east having been excluded since 2015.</p> <p>These very recent changes have meant that the residents in the 38 dwellings closely bordering the site together with interested local people and organisations have not had any opportunity to comment even though there could be significant implications for residents who reside in such close proximity to Green Belt. For this reason, we believe the plan for this site is not legally compliant.</p> <p>Seeking the removal of the whole site from the Green Belt.</p>	<p>The proposed modification seeks to reduce the area proposed for inclusion in the Green Belt in 2015 to reflect the development of land to the immediate west of Dairy Farm Lane. It is acknowledged that this amendment has been incorrectly described but it is shown correctly on the amended Policies Map and in the map included within the Main Modification schedule.</p> <p>It is considered that interested parties have had adequate opportunity to comment on the proposed inclusion of the cricket ground in the Green Belt since it was first identified in Regulation 19 version of the Local Plan Part 2.</p>
41	ID58	MM67	Falling Lane Recreation Ground	Not stated	Not stated	Welcome the designation of additional Metropolitan Open Land.	Noted.

42	ID174	MM73	Chapter 7: Community Infrastructure Sites	Yes	Yes	Support the proposed modification.	Noted.
ADDENDUM TO THE SUSTAINABILITY APPRAISAL							
1	ID32	Screening for Appropriate Assessment - Natural England agrees with the conclusion you have made and have no further comments to make on this consultation.					Noted.
2	ID58	Site 13A (Royal Quay) contains flood zone area 3a and 3b and should be subject to the Sequential Test					Sequential test not required as sufficient developable area identified outside flood zones 2 and 3. The site already received planning permission and has now been completed.
3	ID135	Amendments to policy DMHB incorrectly assessed as having a minor impact on the sustainability performance on the Plan.					The changes to the density matrix are not considered significant in the context of development proposals being assessed against all of the policies in the Development Plan.
4	ID217	<p>The letter to Natural England re Screening for Appropriate Assessment 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 water bodies and protected habitats and perhaps is or should be designated protected in its entirety.</p> <p>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.</p>					Noted. Natural England has been consulted as the appropriate statutory body and has confirmed the Council's statement.

MINOR MODIFICATIONS							
1	ID42	DM10	DMH 2 Housing Mix			The amendments to para 4.6 would not be in conformity with policy H12 of the Draft London Plan and supporting text which states that in some circumstances a higher proportion of smaller units would be appropriate. As such the emphasis the Council is placing on larger homes is considered too restrictive and not applicable to all sites. It is recommended that the additional text referring to the provision of 3 bedroom homes should be removed in order to conform to the draft London Plan.	The Draft London Plan remains under examination and a number of the policies including those on Housing Mix have outstanding objections. It is considered that, for reasons discussed at the hearing sessions, conformity with the Draft London Plan is not required.
2	ID58	DM10	Housing Mix	Not stated	Not stated	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.	The modification is based on evidence of local housing need as supported by paragraph 50 of the NPPF 2012.
3	ID99	DM30	DMHB 13			The word 'enhance' must be inserted between 'and/or' and 'the character'.	Noted.