

London Borough of Hillingdon

Hillingdon Local Plan Part 2
Proposed Submission Version

Summary of Main Issues Arising

September 2014

And

October 2015



HILLINGDON
LONDON

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1. INTRODUCTION

- 1.1. The Hillingdon Draft Local Plan Part 2 has been prepared to support the Hillingdon Local Plan Part 1 "Strategic Policies" adopted by the Council in November 2012. The Draft Local Plan Part 2 comprises three documents; Development Management Policies, Site Allocations and Designations and Policies Map Atlas of Change. The Hillingdon Local Plan Part 2 Proposed Submission Version, September 2014 (referred to in this Report as the Submission Draft 2014) was published by the Council on 22 September 2014 for consultation until 4 November 2014 (a period of six weeks).
- 1.2. Following the consultation and consideration of the representations received, the Council published The Hillingdon Local Plan Part 2 Revised Proposed Submission Version, October 2015 (referred to in the Document as the Revised Submission Draft 2015) for further six week consultation from 26 October 2015 until 8 December 2015. The three documents comprising Submission Draft 2014 and Revised Submission Draft 2015 sets out detail policies that will be used in the determination of planning applications, identifies sites that are required to meet growth targets in the Local Plan Part 1 and map of the policy designations and allocations identified in the Development Management Policies and Sites Allocations and Designations documents.
- 1.3. This document provides a summary of the Main Issues arising from the consultation on the Submission Draft 2014 and the Revised Submission Draft 2015, in compliance with Regulation 22 (c) (v) of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.4. The Town and Country Planning (Local Planning) (England) Regulations 2012 require Local Planning Authorities to prepare "a summary of the main issues raised by the representations". Although a Main Issue is not defined in legislation or guidance, it is generally accepted to mean an issue that goes to the heart of the soundness of the Plan. Guidance from the Planning Inspectorate¹ confirms this, defining 'issues' in this context as "the key points on which decisions about the soundness of the document will depend"² and 'Main Issues' as "issues upon which the soundness of the plan depends"³.
- 1.5. Whilst the broad headings set out in para. 2.2. can be regarded as main issues, the Council has included sub-issues within them to provide further illustration of the main issue itself. In so doing, this is not to necessarily imply that these sub-issues are Main Issue themselves.

Footnote:

1 *Examining Local Plans Procedural Practice*. The Planning Inspectorate, December 2013

2 *Examining Local Plans Procedural Practice*. The Planning Inspectorate, December 2013, paragraph 2.5

3 *Examining Local Plans Procedural Practice*. The Planning Inspectorate, December 2013, paragraph 5.4

2. Outcome of the Consultations

2.1 The Submission Draft 2014

- 2.1.1 The Submission Draft 2014 was approved for consultation by the Council's Cabinet in February 2014. The six week consultation was undertaken from 22 September to 4 November 2014.
- 2.1.2 The Council has not used a web-based consultation portal for the consultation on the Submission Draft 2014 documents, however all consultation documents and supporting evidence were made available on the Council website, as well the forms for submitting representation. At the start of the consultation, copies of the Submission Draft 2014 documents were placed at all local libraries and made available at the Civic Centre. Approximately 2,500 groups and individual whose details are held on Council's consultation database were informed of this consultation. A public notice of the Local Plan Part 2 consultation was also placed in the Uxbridge Gazette.
- 2.1.3 A number of "drop-in" sessions were organised around the Borough during the consultation period to provide information on the Local Plan where officers were available to explain and clarify issues for the public. Approximately 20 individuals attended these sessions organised at different locations around the Borough. Briefing sessions were also held for local Councillors.
- 2.1.3 The Council received a total of 242 representation documents from 102 representors, which covered a range of topic areas. When considered as individual representations to policies and site allocations, there was a total of 283 representations. Table 1 provides a breakdown of these 283 representations by those who responded to the consultation.

Table 1: Summary of representations received by representor

Representors	Number of Representations	
	Number	%
Businesses	12	4.2
Councillors	26	9.2
Consultants	138	48.8
Landowners/Developers	10	3.5
Local Interest Groups	43	15.2
MPs	2	0.7
Statutory Consultation Bodies	33	11.7
Residents/RAs	17	6.0
Others	2	0.7
TOTAL	283	100

2.1.4 Over half of the representations (148) were received from consultants and landowners/developers and around 30% (88) were from residents, residential associations, local interest groups, councillors and Member of Parliament.

2.1.5 Table 2 sets out the representations received for each of the documents. There are 164 (58%) representations received in response to the Development Management Policy document and 85 (30%) are in response to the Site Allocations and Designations document. The remaining 34 (12%) representations are in respect of the Policies Map and the multiple supporting documents that include the Sustainability Appraisal.

Table 2: Total comments received on each Local Plan Part 2 document

Document	Total Reps	Support		Object	
		Number	%	Number	%
Development Management Policies (DMP)	164	21	12.8	143	81.2
Site Allocations and Designations (AD)	85	10	11.8	75	88.2
Policies Map (PM)	23	6	26.1	17	73.9
Representations relating to multiple documents and the Sustainability Appraisal (SA)	11	3	27.3	8	72.7
TOTAL	283	40	14.1	243	85.9

2.1.6 Of the total representations received, 40 (14.1%) representations are in support of all the documents that were subject to the consultation. However, in respect of the Development Management Policies and the Site Allocations and Designations documents, only 12.8% and 11.8% respectively were in support of these documents. The number of respondents objecting to the policies and the content of the documents is significant.

2.1.7 The number of representations received is significant given that this was a Local Plan Part 2 consultation. In these documents there were no policies and proposals that would have significant strategic impact in the Borough, as all strategic development and growth allocations were included in the Hillingdon Local Plan Part 1, adopted by the Council in 2013.

2.2 The Revised Submission Draft

2.2.1 The representations received to the Submission Draft 2014 that have objected to the policies and site allocation as percentage is significant and as an outcome of this consultation, a number changes to the content of the draft documents have been proposed. The outcome of the consultation on the Submission Draft 2014 was

reported to Cabinet on 19 March 2015. Cabinet agreed the proposed changes to the three documents and instructed the officers to incorporate the proposed changes by way of "tracked changes" and to issue the revised document for a further six week period of consultation. The Cabinet also instructed officers to commission a Playing Pitch Study and an Assessment of Nature Conservation Sites, as part of a further evidence base. Cabinet also agreed to undertake a Sustainability Appraisal of the proposed changes to the document resulting from the consultation.

- 2.2.2 The Revised Submission Draft 2014 document incorporating the changes based on the outcome of the September 2014 consultation was reported back to Cabinet in September 2015. Cabinet approved the Revised Submission Draft 2015 document for a further six week public consultation before submission to the Secretary of State for public examination.
- 2.2.3 The Revised Submission Draft 2015 was published for a six week period of consultation on 26 October 2015. This version of the Local Plan Part 2 also included the three main documents (Development Management Policies, Site Allocation and Designations and Policies Map Atlas of Change). The consultation followed a similar process to the Revised Proposed Submission in 2014.
- 2.2.4 At the start of the consultation, copies of the Revised Submission Draft 2015 were placed at all local libraries and made available at the Civic Centre. Approximately 2,500 groups and individual whose details are held on Council's consultation database, including those who made representation to the September 2014 consultation, were informed of the consultation on the Local Plan Part 2. A public notice of the Local Plan consultation was also placed in the Uxbridge Gazette. A number of "drop-in" sessions were organised around the Borough during the consultation period to provide information on the Local Plan, where officers were available to explain and clarify issues for the public. A drop-in session for the Members was also organised.
- 2.2.5 The public attendance at the majority of these events was relatively low, approximately 30 individuals attended the West Drayton Event and the majority of those attending this event were in support of the allocation of the Old Coal Yard site for mixed-use development. An area of concern raised by local residents who attended was the need to ensure that there is provision for sufficient community infrastructure to support new development.
- 2.2.6 The Council received a total of 197 representation documents from 102 representors, which cover a range of topic areas. When considered as individual representations to policies and site allocations, there was a total of 307 representations. Table 3 provides a breakdown of these 307 representations by those who responded to the consultation.

Table 3: Summary of representations received by representor

Representors	Number of Representations	
	Number	%
Businesses	5	1.6
Councillors	11	3.6
Consultants	89	29.0
Landowners/Developers	14	4.6
Local Interest Groups	29	9.4
MPs	7	2.3
Statutory Consultation Bodies	84	27.4
Residents/RAs	66	21.5
Others	2	0.6
TOTAL	307	100

2.2.7 For the October 2015 consultation, the Council has again not used the web-based consultation portal, however all consultation documents and supporting evidence were made available on the Council website as well the forms for submitting representation.

2.2.8 The representations from Local Interest Groups, Resident Associations and local residents was over 30% (102), whilst 33.6% of the representations (123) were from consultants, landowners/developers and business and 27.4% (84) from statutory consultees.

2.2.9 Table 4 shows the breakdown of representations in respect of each document. Of the representations received, 152 (49.5%) are in response to the Development Management Policies document and 141 (45.9%) are in response to the Site Allocations and Designations document. The remaining 14 (4.6%) of the representations are in respect to the Policies Map and the multiple supporting documents that include the Sustainability Appraisal.

Table 4: Total comments received on each Local Plan Part 2 document

Document	Total Reprs	Support		Object		Comments	
		Number	%	Number	%	Number	%
Development Management Policies (DMP)	152	35	23.0	105	69.1	12	7.9
Site Allocations and Designations (AD)	141	61	43.3	75	53.2	5	3.5

Policies Map (PM)	10	2	20.0	8	80.0	0	0.0
Representations relating to multiple documents and the Sustainability Appraisal (SA)	4	1	25.0	2	50.0	1	25.0
TOTAL	307	99	32.2	190	61.9	18	5.9

2.2.10 Of the total representations received, 99 representations (32.2%) are in support of all the documents that were subject to the consultation. In respect to the Development Management Policies, 23 % of the representations in support of the document and for the Site Allocations and Designations documents there are 43.3% in support of the document. Overall, 61.9% of the representations are objecting to the policies and the content of the documents.

2.2.11 Following the assessment of the September 2014 consultation responses and representations, there was considerable revision of the draft documents with amendments to the supporting text and policies, as well as clarification of the issues raised. The changes made to the policies and site allocation and designations in the three documents now have the support of nearly a third of the representations, whilst there is significantly more support for the Site Allocations and Designations document (almost four folds) and almost double the support for the Development Management Policies document.

3. Proposed Submission Draft 2014 : Summary of the Main Issues

3.1 Analysis of the Representations

3.1.1 The Main Issues to arise from representations across the Submission Draft 2014 can be broadly grouped under the following policy areas in respect to each of the three documents:

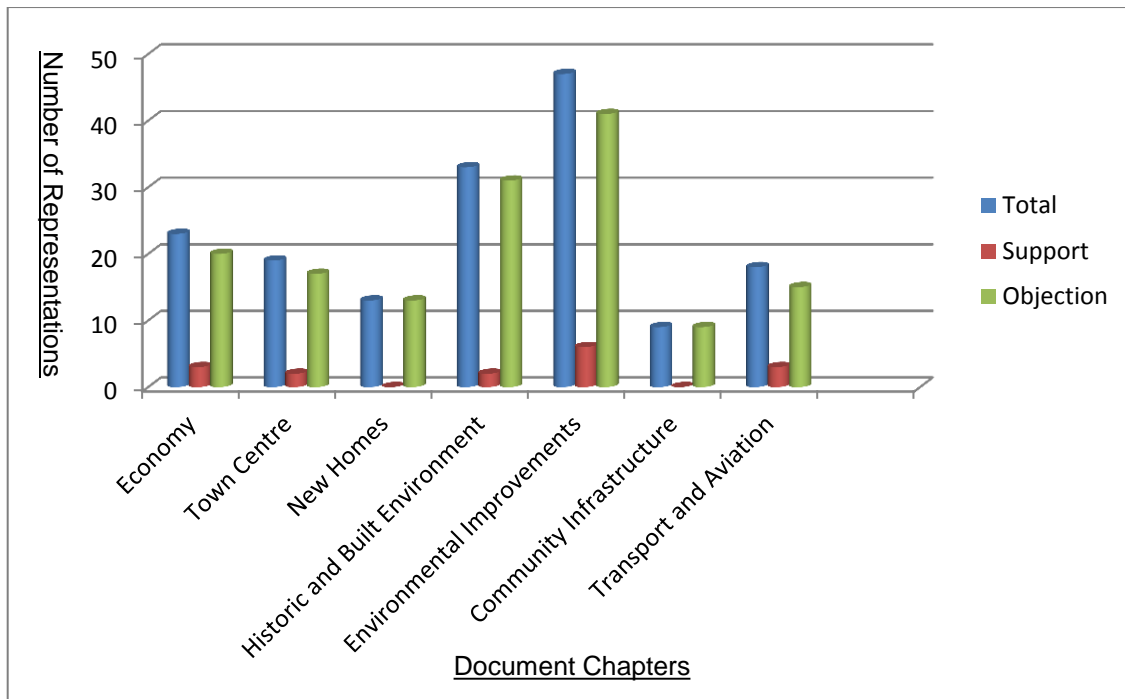
- **Development Management Policies**
 - Economy
 - Town Centres
 - New Homes
 - Historic and Built Environment
 - Environmental Improvements
 - Community Infrastructure
 - Transport and Aviation
- **Site Allocations and Designation/Policies Map**
 - New Homes
 - Rebalancing Employment Land
 - Green Belt, Metropolitan Open Land, Green Chains, Nature Conservation
 - Key Transport Interchanges
 - School Sites
 - Mineral Safeguarding
- **Policies Map - Atlas of Change**
 - Proposed Locally Significant Employment Locations
 - Proposed Locally Significant Industrial Sites
 - Deletion from the Green Belt Boundary
 - Additions to the Green Belt Boundary
 - Proposed Extension to Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance
 - Road Safeguarding
 - Site Allocations - New Homes

3.1.2 Further assessment of the representations received is set out in Diagrams 1-3 below. This shows the breakdown of the number of representations to the chapters and policy areas of the documents, as well as the type of response, whether supporting or objecting to the content of the document.

3.1.3 Diagram 1, shows representations made in respect to the Development Management Policies document. A large proportion of the representations (nearly 50%) is for the Historic and Built Environment and Environmental Improvements chapters. The

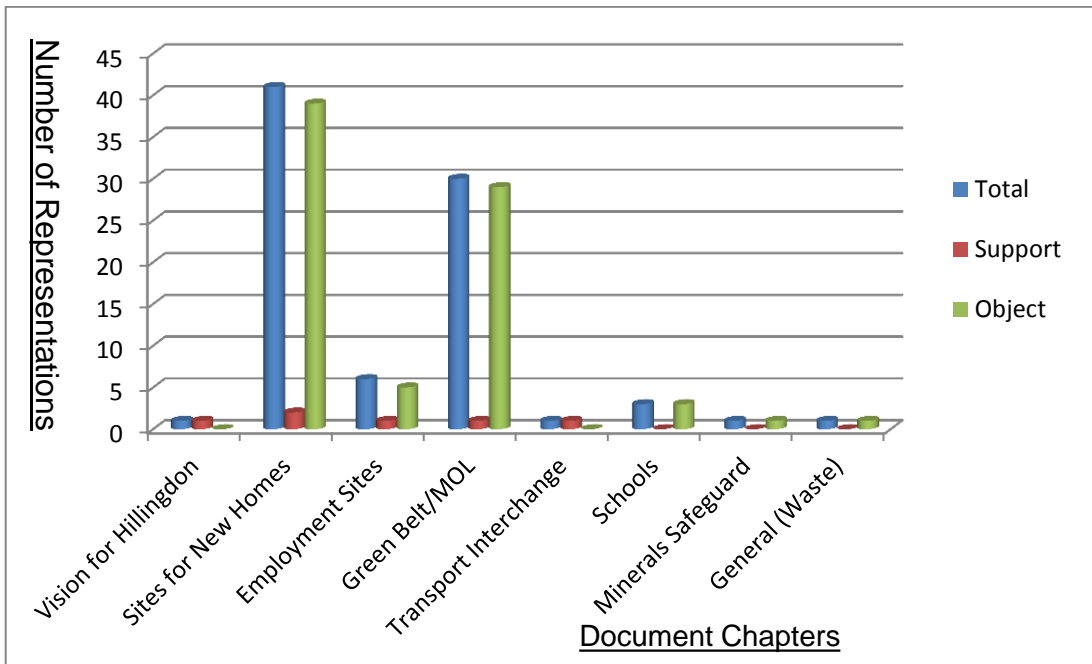
number of representations objecting to the various sections and policies of the document is proportionately similar to the overall percentages.

Diagram 1: Submission Draft 2014 - Development Management Policies



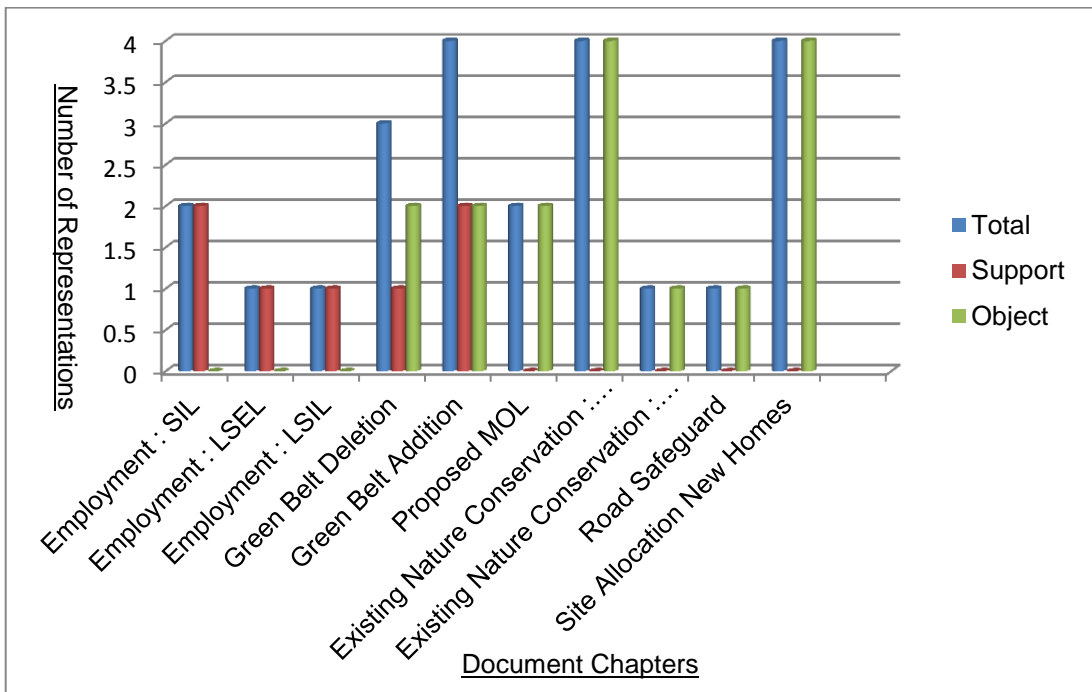
3.1.4 The representations for the Site Allocations and Designations document are shown in Diagram 2. The largest number of representations relates to the Sites for New Homes, Green Belt policy and MOL chapters, with nearly 50% of the representations on Sites for New Homes and over 35% for the Green Belt, Metropolitan Open Land and other environmental land. Nearly all representations are not in support of the allocations and changes proposed in the document.

Diagram 2: Submission Draft 2014 - Site Allocations and Designation



3.1.5 The total number of representations made in respect of the Proposals Map and Atlas of Changes document is relatively small (Diagram 3). The main issue in respect to this document is the additions and deletions to the Green Belt, Nature Conservation Sites and Site Allocations for New Homes.

Diagram 3: Submission Draft 2014 - Proposals Map and Atlas of Change



3.2 Development Management Policies

3.2.1 Economy

- To protect designated employment areas for B1, B2 and B8 uses.
- Office development should recognise the significance of the Heathrow Opportunity Area (HOA) for future office provision in the borough.
- In addition to town centres, the Plan should allow the location of hotels in sustainable locations, in close proximity to Heathrow airport.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DME1, DME3 ; Paras 2.15-2.22, 2.30-2.37

3.2.2 Town Centres

- The requirement to retain a high percentage of retail frontages in primary shopping areas is overly prescriptive and could result in empty units remaining vacant in town centres when other 'A class' uses may be acceptable.
- An additional criteria should be added to Part A of the policy, stating that any change of use from A1 in a Local Centre should be subject to additional test of "range and choice"
- Further evidence required to justify the resistance to hot food take-aways, drinking establishments and other such uses in proximity to schools and sensitive community uses.
- Changes to town centre boundaries in South Ruislip, Willow Tree Lane and Yiewsley town centre,
- specific policies relating to advertisement control,
- Provide a definition of a local centre.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMTC1, DMTC2, DMTC3 ; Paras 3.12 - 3.19

3.2.3 New Homes

- The Housing Mix table setting out the need for the different sizes of units in the borough shows limited need for 1 bed properties. This is unrealistic and unviable.
- Policy should also seek to protect front gardens and place greater emphasis on the protection and value of trees.
- The proposed tenure split between social/affordable rented and intermediate property is not economically viable and the requirement for 35% of all units to be provided as affordable housing is unnecessarily restrictive.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMH2, DMH6, DMH7 ; Paras 4.7-4.9, 4.16-4.19, 4.20-4.25

3.2.4 Historic and Built Environment

- Heritage Assets chapter offers the same level of protection to designated and non-designated heritage assets. When considering the impact of a proposed development, the significance of a designated heritage asset should be

identified and the degree/level of harm considered. Amendments are necessary to differentiate between two levels of protection.

- In addition, officers have proposed a number of changes to chapter 5 to ensure the protection of heritage assets in the borough, in accordance with national planning policy.
- Content from the current Hillingdon Design and Access Statements should be included in the Policy, including height limits for two storey extensions.
- The density standards set out in Table 2 associated with policy are not in accordance with the London Plan.
- The proposed outdoor amenity space standards set out in the supporting text to policy are excessive.
- Living Walls and Roofs are not achievable and will adversely affect the economic viability of development proposals.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMHB1, DMHB16, DMHB19, DMHB20 ; Paras 5.1-5.8, 5.59-5.64, 5.75-5.80, 5.81-5.83

3.2.5 Environmental Improvements

- Air Quality: new housing should not be allowed in areas where pollution is above safe limits and that new developments should not increase air pollution.
- Policy on Air Quality is too restrictive on new development, suggest rewording of the policy to require that development proposals within areas in excess of European levels should aim to achieve air quality improvements over the baseline situation or at the very least aim to be air quality neutral.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DME118 ; Paras 6.54-6.57

3.2.6 Community Infrastructure

- The Plan should ensure that sufficient community infrastructure is provided to support housing growth and the policies do not provide sufficient protection for community infrastructure.
- The Plan has not been accompanied by an objective assessment of needs for higher education to assess the development requirements of Brunel University and an assessment should inform paragraphs relating to education provision.
- A Playing Pitch Assessment is required as a basis for identifying future sporting needs and assessing whether the loss of pitches in the context of policy would lead to a shortfall in provision.
- The need for additional school places over the Plan period has not been addressed.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMCI1, DMCI2 ; Paras 7.1-7.3, 7.6-7.8, 7.9-7.12, 7.23-7.35

3.2.7 Transport and Aviation

- The threshold for transport assessments in Table 8.1 associated with the policy is too restrictive.
- The car parking standards associated with policy exceed those in the London Plan.

- People over 65 should be added to the list of groups identified for which the Council must accommodate spaces.
- Policy: Heathrow Airport should be reviewed when the position on Heathrow is clear.
- Proposals that generate high levels of HGV movements should be located away from residential areas.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMT1, DMT6, DMAV2 ; Paras 8.5-8.8, 8.25-8.31, 8.32-8.35, 8.45-8.54

3.3 Site Allocations and Designation/Policies Map:

3.3.1 New Homes

- Table 3.2: should identify sites that are expected to come forward from the expected adoption date of the Local Plan rather than base date for the Local Plan of 2011.
- Further Alterations to the London Plan have now been agreed by the Inspector and increase Hillingdon's annual monitoring housing target from 425 units to 559 units. This increase should be incorporated into the Plan.
- Allocated Trout Road site currently has planning permission for a mixed use development scheme comprising 99 units, the capacity of the site should be increased to 200 units.
- Residential density proposed for the allocated Nestle site is not high enough. In addition, a higher proportion of the site should be identified for residential use.
- Former Coal Yard site at Tavistock Road site should be identified for residential led mixed use development.
- The sites occupied by TIGI and COMAG, located between Bentinck and Tavistock Road, should be allocated for residential development.
- The owner of the Cape Boards Site states that their site is not available for development and does not wish it to be included in the plan.
- Land at Mount Vernon Hospital should be removed from the Green Belt and allocated for residential use.
- Land at Fairview Business Centre, Clayton Road, should be identified for residential led mixed use development .
- Boundary of site (Chailey Industrial Estate) should be amended to exclude the Matalan site, which is in separate ownership and not available for development.
- Site Allocations and Designations document does not contain and is not supported by an assessment to determine the impact of the proposals on the Strategic Road Network.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy SA10, SA18, SA25, SA29 ; Paras 3.2-3.7

3.3.2 Rebalancing Employment Land

- Loss of employment land is in excess of that identified in the Mayor of London's SPD.

- Designation of the Hayes Industrial Area is supported but the Local Plan needs to make clear that Prologis Park is designated as SIL.
- A number of representors have objected to the retention of designated Strategic Industrial Locations, including the Argent Centre at the Pump Lane; that there is a surplus of designated employment land in the borough and these areas should be released for other forms of development.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy SEA1 ; Paras 4.4-4.6, 4.7-4.8, 4.11, 4.14

3.3.3 Green Belt, Metropolitan Open Land, Green Chains, Nature Conservation

- A number of areas are proposed to be removed from the Green Belt include land at Mount Vernon Hospital, Frogs Ditch Farm and Glebe Farm, Ickenham to accommodate residential development. There is also proposed release of land at Brunel University to accommodate educational uses and land at Springfield Road and Stockley Park for employment uses.
- Ickenham Marshes complex should be recognised as Green Belt.
- Pinn Meadows is proposed to be upgraded from a designated Green Chain to Metropolitan Open Land. The area should be subject to both designations.
- Dual Metropolitan Open Land/Green Chain designation for a number of open spaces in Ruislip, including Haydon Hall Park, Eastcote House Gardens and Cheney Street Parkway, Kings College Playing Fields, Manor Farm.
- Number of sites to be designated as Green Chain, including Parkway open space linking to Columbia Avenue open space.
- Charville Fields and Hayes Park should have their level of open space protection increased.
- Objections to the designation of Ruislip Manor Sports and Social Club as Green Chain.
- Concern regarding the allocation of and evidence base associated with proposed new Nature Conservation Sites of Metropolitan or Borough Grade 1 or 2 importance; these sites to be referred to as Sites of Nature Conservation Importance (SINCs).
- Specific objections to the proposed SINCs at Mount Vernon Hospital, Brunel University and Medipark.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy EM2, DMEI5 ; Paras 5.2-5.10, 5.11-5.19

3.3.4 Key Transport Interchanges

- Ruislip Station Approach should be included in the schedule of Key Transport interchanges.

RELEVANT KEY POLICIES/PARAGRAPHS: Paras 6.1-6.3

3.3.5 School Sites

- Plan needs to identify sufficient sites to meet pupil growth projections over the plan period.

RELEVANT KEY POLICIES/PARAGRAPHS: Paras 7.1-7.6

3.3.6 Mineral Safeguarding

- Plan confuses the requirement to define Mineral Safeguarded Areas and new sites for extraction.

RELEVANT KEY POLICIES/PARAGRAPHS: Paras 8.1-8.4

3.4 Policies Map - Atlas of Change

3.4.1 Proposed Locally Significant Employment Locations

- The proposed expansion of Heathrow Airport will increase industrial vacancy rates.
- The policy is a logical attempt to underpin the broad policies in the Core Strategy to accommodate the required 9,000 jobs over the plan period.

RELEVANT KEY SECTIONS/MAPS: Chapter 2; (Policy DME1, DME2; Paras 2.5-2.8, 2.9 DM Policies) ; Map 2.4

3.4.2 Proposed Locally Significant Industrial Sites

- Supports the removal of the Old Coal Yard site in Tavistock Road, Yiewsley from the IBA designation as it is not suitable for an industrial designation and high generation of HGVs.
- Close proximity of the site to a Crossrail station and bus station would encourage mixed use development which minimises the need for car parking and does not generate HGV traffic.

RELEVANT KEY SECTIONS/MAPS: Chapter 3

3.4.3 Deletion from the Green Belt Boundary

- 59 Reservoir Road to be excluded from Green Belt as it does not meet tests outlined in NPPF and that detailed review of existing Green Belt boundaries should be carried out.
- Support the deletion of Former Perry Oaks Sludge Works Site and consider the A3044 marks a logical boundary.
- Remove land at Mount Vernon Hospital Site from Green Belt, delete proposed extension to the Grade I SINC, include land at the Mount Vernon Hospital Site (Ref. SINC Ext 13) and allocate land at Mount Vernon Hospital Site as a housing site.
- Development of the area as car parking, T5 Business Car Park, and with the realignment of Duke of Northumberland's River, it is not considered that land designated as Green Belt at Longford Park, south of the River, serves Green Belt function; site is isolated from other Green Belt and should be removed from Green Belt.
- Redefining the Green Belt boundary along the river and the airport boundary.

RELEVANT KEY SECTION/MAPS: Chapter 4 ; Maps 4.1, 4.2, 8.13

3.4.4 Additions to the Green Belt Boundary

- The area of land at the rear of the houses in Merle Ave and the Sports Ground, which has no natural boundary and is just part of one large field with only access via a farmyard or public footpath, is included into the Green Belt.
- The sports field for Harefield School and the adjoining land should be included in the Green Belt, ensuring that the Olympic legacy of sport facilities is upheld for local people.

RELEVANT KEY POLICIES/MAPS: Chapter 5 ; Map 5.1

3.4.5 Proposed Metropolitan Open Land

- Justification should be provided for removing land designated as MOL from the UDP designation. Guidance suggests MOL and 'Areas forming links in a Green Chain' compatible.
- Removing Green Chain classification from Pinn Meadows would reduce protection afforded to this area and is contrary to the Council's stated aims. Removal of this status is not highlighted elsewhere (e.g. under the heading 'Green Chain Deletion' in the Site Allocation and Designations document). The site should be retained as MOL and Green Chain.
- Status of Bessingby/Cavendish/Pine Gardens Parks, Warrender Park and Highgrove Woods to be upgraded to MOL as these meet the criteria.

RELEVANT KEY SECTIONS/MAPS: Chapter 6 ; Map 6.3

3.4.6 Amendments to Areas Forming Links in Green Chains

- Parkway Open Space linked to Colombia Avenue Open Space by railway embankment as Green Chain.

RELEVANT KEY SECTIONS/MAPS: Chapter 7

3.4.7 Proposed Extension to Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance

- Nature Reserve boundary shown for Frays Island/Mabey's Meadow Nature Reserve on Thorney Mill Road is inaccurate in that it omits the meadow element.
- Boundary of the Frays Farm Meadows Nature Reserve is omitted from the Plan, as is the boundary of the wider Frays Valley Local Nature Reserve.
- Proposed extension to SINC 6 (Yeading Brook, Minet Country Park, Hitherbroom Park) is unsound as it pays no regard to works approved by the planning permission and the safeguarding within the Council's Development Management Policies which permits works to create a new access from Pump Lane to Southall Gas Works site, drainage and flood relief works. Extension to SINC should be revised to omit the land adjoining Pump Lane.

RELEVANT KEY SECTIONS/MAPS: Chapter 8; Map 8.5

3.4.8 Proposed Extensions to Nature Conservation Sites of Borough Grade 2 or Local Importance

- Boundary of Crane Meadows Nature Reserve is omitted from the Plan; this Nature Reserve site lies between River Crane and airport perimeter - its designation and improvement is an important enhancement to the Green Belt and river corridor.

RELEVANT KEY SECTIONS/MAPS: Chapter 10

3.4.9 Road Safeguarding

- Map 12.1 does not reflect or adequately take account of the permitted scheme for Southall Gas Works; position of the road safeguarding not in accordance with the position of the eastern access route approved; plan does not identify the location of two further permitted pedestrian and cycle routes bridging the canal to provide access to Minet Country Park and Springfield Road; amend the map to take account of eastern access, pedestrian and cycle bridges.
- Road safeguarding contemplated by Map 12.1 does not appear to have been considered alongside SINC Ext 6: (Yeading Brook, Minet Country Park, Hitherbroom Park).

RELEVANT KEY SECTIONS/MAPS: Chapter 12; Maps 12.1

3.4.10 Site Allocations - New Homes

- Extending boundary of the centre to include existing retail units on the south side of Glencoe Road, which function as part of the centre due to excellent pedestrian links.
- Fails to plan positively to promote a competitive town centre environment.
- Policy is out-of-date and inaccurate and should be updated to reflect the most recent planning history for Enterprise House.
- Plan does not show full extent of Trout Road site, which totals 2.31 ha. Map should be amended in accordance with the submitted red line plan and allocation could be solely for residential development.
- Existing car park, north of the site, owned by Network Rail should be included within the site boundary.

RELEVANT KEY SECTIONS/MAPS: Chapter 17 ; Maps 17.9, 17.28

3.5 Conclusion on the Outcome of the Consultation

3.5.1 The Council has received a good response to the consultation on the Proposed Submission Draft document. The representations received have been from local residents, businesses, local groups, developers/landowners and statutory bodies. The assessment of the consultation responses required significant changes to the content of the proposed Submission documents, in particular due to the high percentage of objections to the Development Management Policies and the Site Allocations and Designation documents. The changes are both to the general text and policies.

3.5.2 Given the significance of the changes, it was consider appropriate there should be further Regulation 19 consultation on the amendment to the document. Cabinet on

the consideration of the consultation, agreed that further Regulation 19 consultation should be undertaken to enable the community and stakeholders to consider the amendments and give their response.

4. Revised Proposed Submission Draft 2015 : Summary of the Main Issues

4.1 Analysis of the Representations

4.1.1 The Main Issues to arise from representations across the Revised Submission Draft 2015 can be broadly grouped under the following Policy areas in respect of each of the three documents:

- **Development Management Policies**
 - Economy
 - Town Centres
 - New Homes
 - Historic and Built Environment
 - Environmental Protection and Enhancement
 - Community Infrastructure
 - Transport and Aviation
 - Appendices

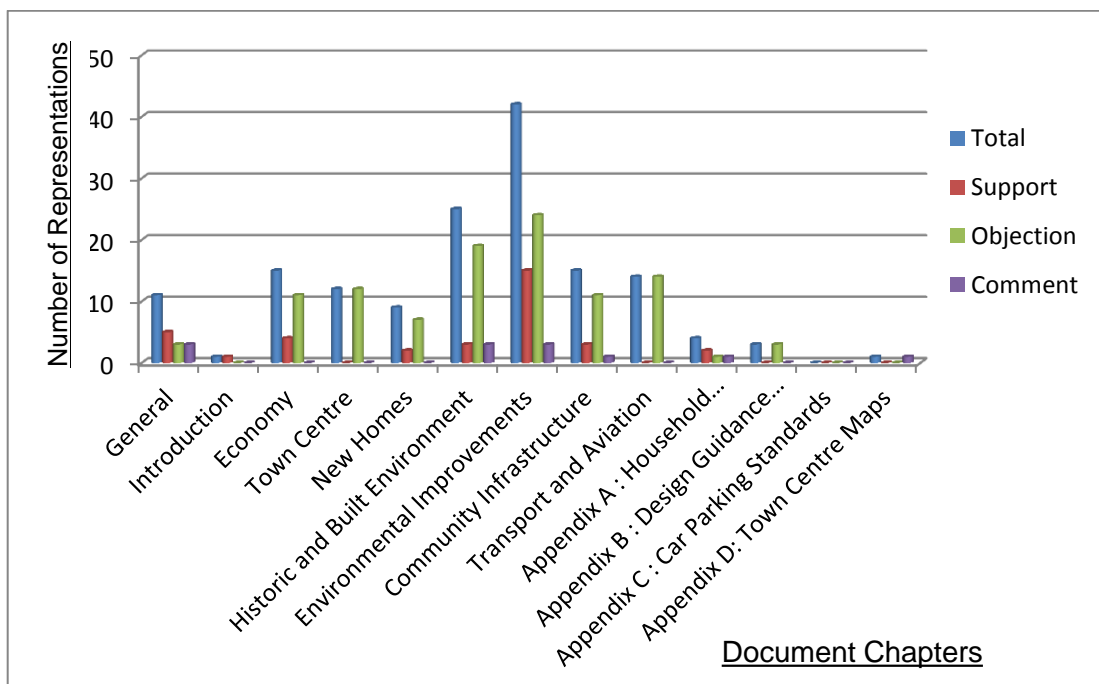
- **Site Allocations and Designation/Policies Map**
 - General Comments
 - New Homes
 - Rebalancing Employment Land
 - Green Belt, Metropolitan Open Land, Green Chains, Nature Conservation
 - Key Transport Interchanges
 - School Sites
 - Mineral Safeguarding

- **Policies Map - Atlas of Change**
 - Proposed Locally Significant Employment Locations
 - Proposed Locally Significant Industrial Sites
 - Office Growth Location
 - Office and Hotel Growth Location
 - Additions to the Green Belt Boundary
 - Proposed Extension to Nature Conservation Sites of Metropolitan or Borough Grade 1 Importance
 - Site Allocations - New Homes
 - Road Safeguarding

- Site of Special Scientific Interest
- Proposed Amendment to Boundary of Heathrow Airport
- Other Issues

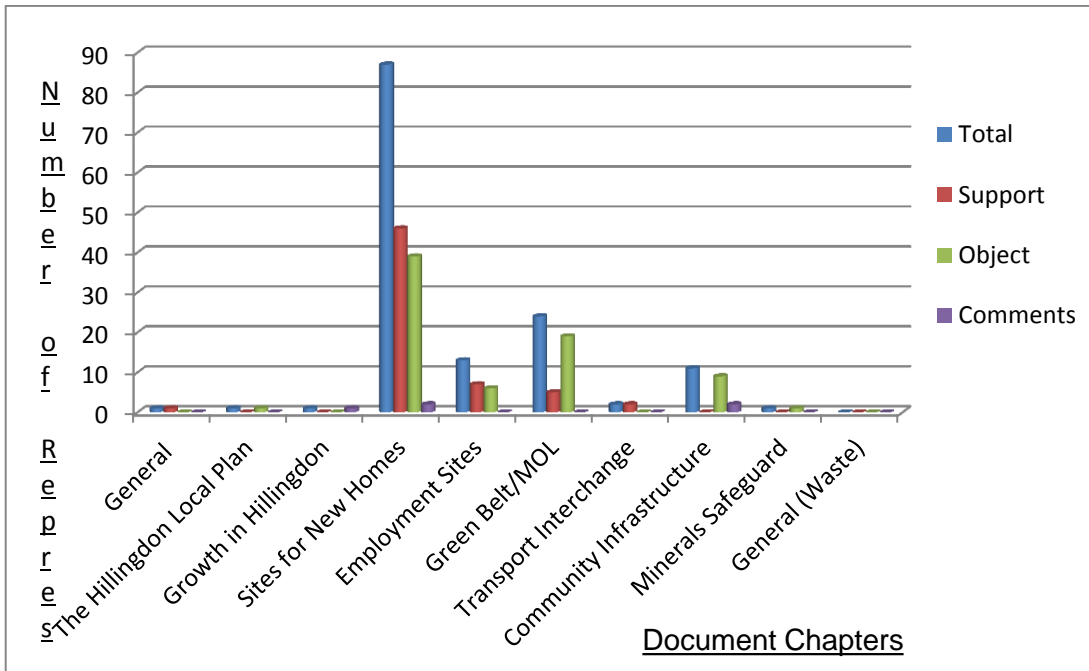
4.1.2 Further assessment of the representations received are set out in Diagrams 4 - 6. This shows the breakdown of the representations received for the various chapters of the documents. For the Development Management Policies document, over 44% (67) of the representations are for the historic and built environment and the environment enhancement policies, as shown in Diagram 4. Of these just over quarter are in support of the policies

Diagram 4: Revised Submission Draft 2015 - Development Management Policies



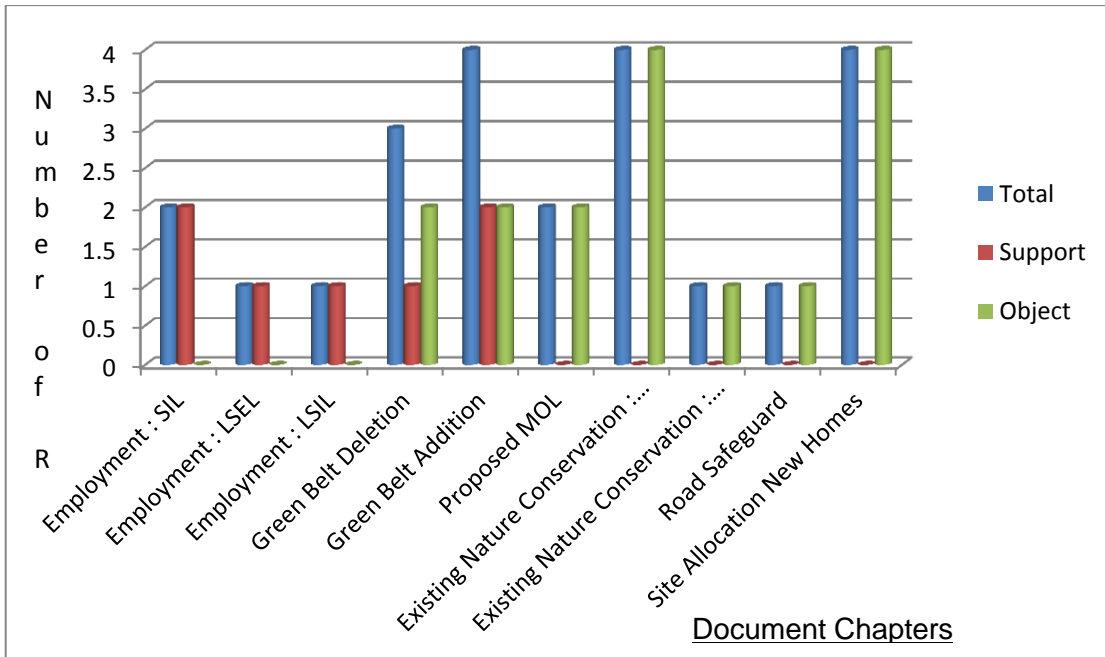
4.1.3 In respect of the Site Allocations and Designations document, Diagram 5, over 62% (87) of the representations are for the sites for new homes and around 17% for the Green Belt, Metropolitan Open Land and other environmental land. There is over 50% support for the policies and sites for new homes.

Diagram 5: Revised Submission Draft 2015 - Site Allocations and Designation



4.1.4 The breakdown of the representations received for the Proposal Map - Atlas of Change is shown in Diagram 6. The main representation is in respect to the Green Belt Addition, Existing Nature Conservation Sites and Site Allocations for New Homes. The representations are not in support of the changes proposed to the boundaries or the alignment of the designations.

Diagram 6: Revised Submission Draft 2015 - Proposals Map and Atlas of Change



4.2 Development Management Policies

4.2.1 General

- Reference to the strategic office location should be consistent across all Local Plan Part 2 documents.
- Hillingdon has a Regionally Important Geological site; The London Plan - Map 7.4 (GLA29 - The Gravel Pits Northwood). There should be a local plan policy for the management and protection of this site.

4.2.2 The Economy

- Seek to protect designated employment areas for B1, B2 and B8 uses. Policy should include more flexibility to allow other uses on designated employment sites, in response to changing economic circumstances.
- Criteria contained in the policy state that proposals for non B1, B2 and B8 uses will be acceptable in designated employment areas, where sites have been consistently marketed for a period of 2 years. This requirement should be removed.
- Identify suitable locations for office development. More flexibility needed to allow office development outside of preferred locations.
- Should recognise the significance of the Heathrow Opportunity Area for future office provision in the borough.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DME 1, DME 3; Paras 2.5-2.8, 2.11-2.18

4.2.3 Town Centres

- Policy specifies that the Council will support main town centre uses where the development proposal is consistent with the scale and function of the centre, subject to adequate width and depth of floorspace being provided. This criterion should be removed.
- Retention of A1 retail uses in primary and secondary frontages is not supported.
- Objections to the absence of Sovereign Court, Sipson Road in the list of local parades.
- No explanation provided as to how limiting hot food takeaways (A5 uses) to 15% of the frontage in local centres has been reached.
- No justification for grouping together betting shops, restaurants and takeaways and minicab offices in the policy.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMTC 1, DMTC 3; Paras 3.4-3.6, 3.12-3.16

4.2.4 New Homes

- Concerns that the proposed housing mix will result in the delivery of low density development across the borough; clarity is needed to ensure the policy continues to promote housing delivery and should confirm that the housing mix will be applied on a site by site basis, dependent on the location.
- Presumption against the loss of back gardens is unreasonable.

- All residential schemes of 10 units should meet the Council's 35% affordable housing target.
- Flexibility to adjust the quantum and tenure of affordable housing to reflect site specific circumstances is essential.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMH2, DMH6, DMH7; Paras 4.6-4.9, 4.15-4.18, 4.19-4.24

4.2.5 Historic and the Built Environment

- An overarching sentence stating that; "the Council will expect development proposals to avoid harm to the historic environment" is included in the policy.
- Policy should note that locally listed buildings can be demolished subject to the provisions of appropriate policies being met.
- Advice on shopfronts should be contained in a single section or in two separate sections.
- Policies regarding advertisements are too restrictive and not based on locally specific evidence, signage should not need to be restricted to certain areas of the shopfront - each proposal must be considered on its merits and a ban on flashing box signage is not justified.
- No need to make special mention of particular types of advertisement as all is covered by the statutory definition.
- A number of provisions regarding advertisement policy are contrary to national policy and guidance. Proposals should be acceptable provided they do not detract from amenity.
- Concerns regarding the approach to moorings, which should be promoted throughout the plan. No specific reasons why moorings cannot be located on rural stretches of the canal and moorings should be an integral part of the Blue Ribbon network, including the Grand Union Canal. Development should take account of the Canal & River Trust's 'Hillingdon Towpaths' document.
- Policy should incorporate the recently introduced national housing standards.
- Density guidelines in table 5.3 are not justified by evidence base and should be removed.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMHB1, DMHB3, DMHB13, DMHB16, DMHB17, DMHB20; Paras 5.2-5.8, 5-12-5.14, 5.50-5.53, 5.59-5.63, 5.64-5.68, 5.81-5.83

4.2.6 Environmental Protection and Enhancement

- Proposed deletion of Sustainable Design Standards will not fulfil the requirements of policy BE 1 in the Local Plan Part 1.
- Disappointment that Warrender Park/ Highgrove Woods/ Bessingby/ Cavendish/ Pine Gardens Parks have not been upgraded to MOL.
- Policy weakens the protection of Green Chains in the Borough. UDP policy EM2 should remain.
- The impact of renewable energy installations on heritage assets should be referred to in the policy on Biodiversity Protection and Enhancement.

- Policy should note that there are circumstances when it is appropriate for developments to be built up to the canal edge; the proposed 5 metre set back could create unsightly 'dead space'.
- Important that development proposals pass sequential test before a flood risk assessment is undertaken; for development sites in Flood Zones 2, 3 and 3b that pass sequential test, a sequential approach should be used so that the most vulnerable uses are placed at lowest risk of flooding.
- Policy contains no specific references to climate change; flood defences should be commensurate with the lifetime of the development and new development should not prevent upgrading of flood defences.
- Policy should include text to address misconnections in the sewer network.
- Policy should refer to the national housing standards and supporting text should note that this standard will be conditioned to ensure its application through Building Regulations.
- Sentence in Para 6.53 stating that 'the Site Allocations document identifies sites that might have capacity issues and notes this as a constraint' should be deleted, as it infers all other sites in the document do not have capacity constraints, which could change if the scale and phasing of a site changes.
- The deletion of Policy Submission Draft 2014 document has not been remedied by the proposed new in addressing water quality.
- Developments located in areas of decentralised energy should be future proofed for connection to the London Heat Network.
- Policy confuses requirement to identify new sites for mineral extraction with Mineral Safeguarding Areas; Land south of Harmondsworth Quarry and North of the A4; Land at Bedfont Court should be identified as specific sites.
- Basis for policy is unclear, not consistent with national planning policy guidance.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMEI 1, DMEI 3, DMEI 4, DMEI 5, DMEI 7, DMEI 8, DMEI 9, DMEI 10, DMEI 13, MIN 1 ; Paras 6.4-6.6, 6.7-6.9, 6.21-5.22, 6.23, 6.25-6.29, 6.30-6.39, 6.40-6.44, 6.45-6.53, 6.65-6.71, 6.75

4.2.7 Community Infrastructure

- Policies in the Plan are not sufficient to meet the requirements of the NPPF relating to open space and sports provision.
- There should be no loss of community facilities in areas of significant housing development.
- Requirements for play areas should be based on London Plan child yield figures.
- Policy should refer to outdoor sports facilities.
- Policy should refer specifically to Ruislip Woods SSSI as an area of protection.
- References to the Council's Community Infrastructure Levy should be used with caution as this will not be sufficient to meet the Council's infrastructure requirements over the plan period.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMC11, DMC13, DMC15, DMC16, DMC17, ; Paras 7.4-7.5, 7.6-7.8, 7.24-7.28, 7.29-7.30, 7.33-7.35

4.2.8 Transport and Aviation

- Threshold for travel plans should be updated to reflect TfL guidance.
- Cycle Parking standards should be minimum rather than maximum, to ensure compliance with London Plan.
- Policy should refer to the legible London walking scheme.
- Policy and Appendix A, Table 1: Whilst the London Plan provides for flexibility in parking standards, they should reflect those in the London Plan. It should be noted that other representors supported higher parking standards for office uses.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy DMT1, DMT5, DMT6; Paras

4.2.9 Appendices

- Policy DMHD 3: Policy is supported but basements should be fitted with a pumping device to ensure they are protected from sewer flooding. (Appendix A)
- Much of the advice relating to advertisement signage is unnecessary and overly restrictive (Appendix B).

4.3 Site Allocations and Designation/Policies Map: Key Issues Raised and Officer Responses

4.3.1 General Comments

- Local Plan should not rely on future transport assessments. Further evidence is required to assess the cumulative impacts of all allocated sites on the Strategic Road Network.
- Need to review the Site Allocations and Designations document in advance of 2021.

RELEVANT KEY POLICIES/PARAGRAPHS: Policy SA1-SA41 ; Paras 3.1-3.20

4.3.2 New Homes

- Failure to consult with Gypsies and Travellers during the production of the Gypsy and Traveller Assessment. Council's approach does not reflect the needs of Gypsies and Travellers in the borough and a further assessment of need is required.
- Document does not provide sufficient information on how London Plan housing targets will be exceeded in accordance with London Plan policy 3.3.
- Policy should refer to the amended outline permission. Based on the permission it would be appropriate to increase the delivery of the site by 15% (SA 2).
- Boundary of policy designation should be amended to include the Crown Trading Estate (SA 4).
- More flexibility needed to increase the residential capacity across the Nestle site, proposed division between parts A, B and C is inaccurate, requirement for

comprehensive development should be removed and need for sports pitch provision is questioned (SA5).

- The balance of the loss of employment land and delivery of residential units has not been fully considered (SA5).
- Network Rail land should be included in the allocation of this site and the residential capacity on site C should be increased (SA5)
- Council should bring allotments back into use (SA12)
- Object to the exclusion of the Matalan element of the site (SA22).
- The proposal to allocate Benlow Works in isolation is not supported and the wider Silverdale Road site should be allocated for residential-led mixed use development (SA 24).
- The proposed allocation of the Old Coal Yard site for mixed-use development is widely supported, but has attracted objections from Powerday and Network Rail. (SA37)
- Proposed allocations adjacent to the canal are generally supported, subject to access to the canal being improved and the provision of residential moorings.
- Western Core Allocation should be re-introduced.
- Onslow Mills should continue to be included in the allocation SA39.

RELEVANT KEY POLICY/PARAGRAPHS/MAPS: Policy SA2, SA4, SA5, SA12, SA22, SA24, SA37, SA39; Paras 3.1-3.20

4.3.3 Rebalancing Employment Land

- Continued consolidation and designation of SIL and LSIS is supported, however paragraph 4.14 relating to mixed use development along the canal frontage creates ambiguity. These sites should either be designated as SIL or released for mixed use development.
- No evidence to support the allocation of Odyssey Business Park as an LSEL.
- Stockley Farm should be designated as a Locally Significant Employment Location (LSEL).

RELEVANT KEY PARAGRAPHS/MAPS: Paras, 4.1-4.14, 4.27, 4.34; Map J,

4.3.4 Green Belt, Metropolitan Open Land, Green Chains, Nature Conservation

- Site specific support and objections for proposed additions and deletions from the Green Belt.
- Seeking joint designation of MOL/Green Chain sites identified in the Plan.
- Site specific support for and objections to proposals relating to SINC.

RELEVANT KEY PARAGRAPHS/PAGES: Policy; Paras 5.1-5.12; Pages 153-159, 169-173, 175, 177, 182, 184-185, 250; Tables 5.1, 5.3

4.3.5 Key Transport Interchanges

- Safeguarding of Transport Interchanges is supported.

RELEVANT KEY POLICIES/PARAGRAPHS: Paras 6.1-6.7

4.3.6 Community Infrastructure

- Concerns expressed that the plan fails to make sufficient infrastructure provision in the borough, particularly community infrastructure provision.
- Plan has not been informed by an objective assessment of development needs for higher education and policies should be added to address these needs in full. This should include the allocation of Brunel University Campus for higher education uses and a Green Belt review that removes the Green Belt designation from sites 1, 2, 3 and 4.

RELEVANT KEY POLICIES/PARAGRAPHS: Paras 7.1-7.18

4.4 Policies Map - Atlas of Change

4.4.1 Proposed Locally Significant Employment Locations

- Support designation of Heathrow Boulevard, 282 Bath Road within Bath Road, Hayes Locally Significant Employment Site (Map 2.4) and Office Growth Location (Map 4.2).

RELEVANT KEY SECTIONS/MAPS: Chapter 2; (Policy DME1, DME2; Paras 2.5-2.8, 2.9 DM Policies); Map 2.4

4.4.2 Proposed Locally Significant Industrial Sites

- Crown Trading Estate should be released from employment and allocated for mixed-use development, or alternatively re-allocated as a Locally Significant Industrial Site.

RELEVANT KEY SECTIONS/MAPS: Chapter 1; Map 1.1(iv) and Chapter 2; (Policy DME1, DME2; Paras 2.5-2.8, 2.9 DM Policies),

4.4.3 Office Growth Location

- Support designation of Heathrow Boulevard, 282 Bath Road within Bath Road, Hayes Locally Significant Employment Site (Map 2.4) and Office Growth Location (Map 4.2).

RELEVANT KEY SECTIONS/MAPS: Chapter 2, 4; Maps 2.4, 4.2

4.4.4 Office and Hotel Growth Location

- Support proposed designation of Sovereign Court, Sipson Road and Strata House, 264-270 Bath Road within Bath Road Hotel and Office Growth Location, Cluster 5 (Map 6.1 & 6.5).

RELEVANT KEY SECTIONS/MAPS: Chapter 6; Maps 6.1, 6.5

4.4.5 Additions to the Green Belt Boundary

- Property at 8 Woodfield, Harefield is incorrectly mapped. No 8 should be shown as larger than No 7 and does not include the existing outbuilding and a swimming pool located to the south of the property. The Green Belt boundary should be located to the south of the swimming pool.

RELEVANT KEY POLICIES/MAPS: Chapter 8; Map 8.1

4.4.6 Proposed Extensions to Nature Conservation Sites of Borough Grade 2 or Local Importance

- Extension pays no regard to works approved under planning permission and safeguarding within Council's Development Management Policies which permits works to create a new access from Pump Lane to the Southall Gas Works site, along with the drainage and flood relief works.
- Route of access to Southall Gas Works development site is not adequately illustrated.

RELEVANT KEY SECTIONS/MAPS: Chapter 11, 14; Maps 11.5, 14.1

4.4.7 Site Allocations - New Homes

- Consider that site allocation SA 16: Northwood Station should be removed from Table, as overarching sustainability impacts of proposed allocation are strongly negative (SA16).

RELEVANT KEY SECTIONS/MAPS: Chapter 19; Maps 19.16,

4.4.8 Road Safeguarding

- Map does not reflect or adequately take account of the permitted scheme in respect to the position of the western access route and location of two further permitted pedestrian and cycle routes bridging the canal (Map 14.1).

RELEVANT KEY SECTIONS/MAPS: Chapter 14; Maps 14.1,

4.4.9 Site of Special Scientific Interest

- Some nature reserve boundaries omitted from Policies Map, pointed out in first consultation:
 - Full extent of Frays Island - Mabey's Meadow Nature Reserve (West Drayton)
 - Frays Farm Meadows and the wider Frays Valley LNR (Ickenham) (Map 27.2)
 - Crane Meadows (Heathrow East).
- Full extent of Frays Island nature reserve, Frays Farm Meadows and Crane Meadows are not correctly shown on the Policies Map.

RELEVANT KEY SECTIONS/MAPS: Chapter 27; Maps 27.2,

4.4.10 Proposed Amendment to Boundary of Heathrow Airport

- Airport boundary shows number of errors and should be amended to include land parcels at: pod parking, gap shown to south east of Longford Roundabout, Spout Land reservoir, Esso Petrol Station on Southern Perimeter Road and commercial buildings along Great South West Road between Stanwell Road and Twin Rivers.
- Title should be changed to "Heathrow CTA Public Transport Interchange" as it links to other forms of public transport.

RELEVANT KEY SECTIONS/MAPS: Chapter 13; Maps 13.1

4.4.11 Other Issues

- Gravel Pits Northwood should be identified as Regionally Significant Geological Site on the Polices Map

4.5 Other Documents

4.5.1 Sustainability Appraisal

- Northwood Station site SA16 should be removed from the Plan. The overarching sustainability impacts of the allocation are negative.

4.5.2 Strategic Flood Risk Assessment

- Section 3.4 suggests that 1 in 20 year modelling will be used as a starting point to define Flood Zone 3b. Should provide a more specific definition of Flood Zone 3b preventing need for site by site assessment of whether a site is in Flood Zone 3b.
- Two sites have not been included in sequential test that are in areas of flood risk - Packet Boat House does not need further flood risk assessment. Site SA 13 (Royal Quay) contains areas of Flood Zone 3a and b, and so must be assessed as part of the Sequential Test.
- Allocated sites that have passed sequential test and fall within Flood Zones 2 & 3 should also draw upon evidence base documents to highlight specific design criteria within the plan. For inclusion within site allocations document wording should be tailored for each individual site.
- Note the inclusion of site specific Flood Risk Assessment of sites in flood zones alongside requirement that flood plan is retained. Document does not adequately demonstrate the application of Sequential Test and design of sites following the sequential approach. Other sites in the borough, outside of high and medium flood risk, have not been considered before allocating such sites.

4.6 Conclusion on the Outcome of the Consultation

4.6.1 The Council has received a good response to the reported Regulation 19 consultation on the Proposed Revised Submission Draft document. The representations received have been from local residents, businesses, local groups, developers/landowners and statutory bodies. The assessment of the consultation responses shows that whilst there are still a number of objections, there is only a small number raised that would require significant amendment to the text and policy, whilst a large number would require minor amendments that are not considered to be significant.

4.6.2 As required by the regulations, the Proposed Modification document has been prepared setting out the Council's response to the consultation for the consideration of the Planning Inspector appointed to examine the Local Plan.

5. Modifications Proposed

5.1 Major Modifications

- 5.1.1 Appendix A of this document contains a Statement of Proposed Main Modifications to the Revised Proposed Submission Local Plan Part 2 documents. The modifications set out in the document will form the basis of discussions during the Local Plan Part 2 examination process.

5.2 Minor Modifications

- 5.2.1 Appendix B of this document contains a Statement of Proposed Minor Modifications to the Revised Proposed Submission Local Plan Part 2 documents. The modifications set out in the document will form the basis of discussions during the Local Plan Part 2 examination process.